

WILLIAM J. HORNBUCKLE  
*President and Chief Operating Officer*

Mr. F. James Sensenbrenner, Jr.  
Chairman, Committee on the Judiciary  
United States House of Representatives

SUBCOMMITTEE HEARING ON H.R. 21 (UNLAWFUL INTERNET GAMBLING FUNDING PROHIBITION ACT)

Dear Chairman Sensenbrenner:

MGM MIRAGE is one of the world's leading and most respected entertainment, hotel and gaming companies that owns and operates 15 casino properties located in Nevada, Mississippi and Michigan. The company employs over 43,000 people, manages \$10 billion in assets and generates over \$4 billion in operating revenues annually. In August of 2001, MGM MIRAGE launched a new subsidiary, MGM MIRAGE Online, to study the development, deployment and operations of an interactive gaming site. Since that time, a great deal of due diligence has gone into understanding the key issues surrounding this evolving industry. We launched our online casino, PLAYMGMMIRAGE.com, in September 2002 and market mainly to customers in the United Kingdom.

I believe, as do a large number of my colleagues in the regulated gaming industry, that H.R. 21 (the Unlawful Internet Gambling Funding Prohibition Act) will do nothing to stop online gaming in the United States and will only serve to push it further into unregulated markets. Therefore, we do not support H.R. 21 and believe that H.R. 1223 (the Internet Gambling Licensing and Regulation Commission Act) is an appropriate and prudent approach to this complex subject. Only through effective research and study can sound legislation be drafted. Our company would welcome the opportunity to share all of our research to help the Committee members make an educated decision regarding pending legislation involving online gaming.

We believe our Code of Conduct, systems and operations will become the worldwide benchmark in technology, operational control, credibility and security. The attachments outlined below show the high quality of legislation, regulation and operations that our company has committed to operate within:

- Testimony of William J. Hornbuckle, MGM MIRAGE Executive Vice President - Marketing; MGM MIRAGE Online President and Chief Operating Officer
- Online Gaming Industry, Legislative and Regulatory Overview - an overview presentation that briefly addresses many of the issues surrounding the online gaming industry, including opinion on the impact of the Unlawful Internet Gambling Funding Prohibition Act
- MGM MIRAGE Online Statement of Claims - Our compilation of "world's best practices" from the major online gaming jurisdictions, compiled into over 900 claims by which we run our business. We have taken strides to become a world leader committed to the highest regulatory standards.
- Isle of Man Online Gambling Regulatory Act 2001 and Regulations
- Isle of Man Anti-Money Laundering (Online Gambling) Code 2002 and Guidance Notes

Again, thank you this opportunity, and please feel free to have any member of the Committee or their respective staff contact us should you have any further questions or would like a detailed walk-through of the presentation or materials.

Sincerely,



Mr. William J. Hornbuckle  
President and Chief Operating Officer

# **Appendix**

## **MGM MIRAGE Online Online Gaming Industry, Legislative and Regulatory Presentation**



Legislative Presentation

Submission to the  
House Judiciary Committee

April 2003





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# Bill Hornbuckle

## President & Chief Operating Officer



PLAY NEWYORK.COM  
NEWYORK

# Key Takeaways

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- MGM MIRAGE – significant stake holder, leadership role internationally and domestically
- World class geo-verification and player protection modules
- Extensive security / technology certification process
- Commitment to respect all explicit laws
- Leach-Oxley serves to increase existing problems associated with online gaming and pushes the activity further into unregulated markets
- Market growth still expected to be 20%
- Support Conyers bill – seeking active participation in study commission
- MGM MIRAGE – clearly recognize what is at stake; have desire to compete in the global gaming market

# Legislative Overview

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- Unlawful Internet Gambling Funding Prohibition Act
- Internet Gambling Licensing and Regulation Commission Act

# Leach-Oxley Bill

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## What does it accomplish?

### Provisions for:

- states rights, horse racing, fantasy sports, technical service providers

### Provisions against:

- Indian gaming, e-payment providers, financial institutions

### Questions:

- skill games, “games subject to chance”, expansion of multi-state lottery products, information services, “business of betting”, technology expansion

# Leach-Oxley Bill

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## Prohibition/Law of Unintended Consequences:

- Eliminates credible financial institution – opens to fraud and money laundering
- Pushes regulations/probity concerns offshore
- Pushes any economic benefit and tax offshore
- Pushes technology providers and e-payment solutions offshore
- Prohibits qualified, legitimate operators from entering space
- Does not stop the activity



# GAO Report

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“The credit card industry’s efforts to restrict the use of credit cards for Internet gambling could reduce the projected growth of the Internet gaming industry in 2003 from 43 to 20 percent, reducing industrywide revenues from a projected \$5.0 billion to approximately \$4.2 billion.”

# GAO Report

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“Banking and gaming regulatory officials did not view internet gambling as being particularly susceptible to money laundering, especially when credit cards, which create a transactions record and are subject to relatively low transaction limits are used for payment.”

# GAO Report

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“One U.S. law enforcement official attributed the lack of adjudicated cases involving money laundering through Internet gambling sites to several factors, most notably the lack of any industry regulations and oversight.”

# Conyers Bill: Study Commission

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- Findings & Policy Excerpts

“Because of the nature of the Internet, legislative attempts to prohibit Internet gambling are unlikely to be effective, and may adversely impact American’s rights to due process and individual privacy.”

# Conyers Bill: Study Commission

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- **Commission to Study:**
  - Legal framework
  - Existing regulation – International, Federal, State, Local laws
  - Problem gambling
  - Gambling of minors
  - Money laundering
  - Potential regulatory measures
  - Issues of Federalism
  - Existing problem of unregulated Internet wagering



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# Online Gaming Industry, Legislative and Regulatory Overview

# Background

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- The creation of online gaming as a core competency of MGM MIRAGE
- Due diligence / Business Plan
- Utilized a Prize Site to gain knowledge of the online games environment – WagerWorks
- Awarded one of three initial licenses in the Isle of Man
- Investment to date



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# Market Summary

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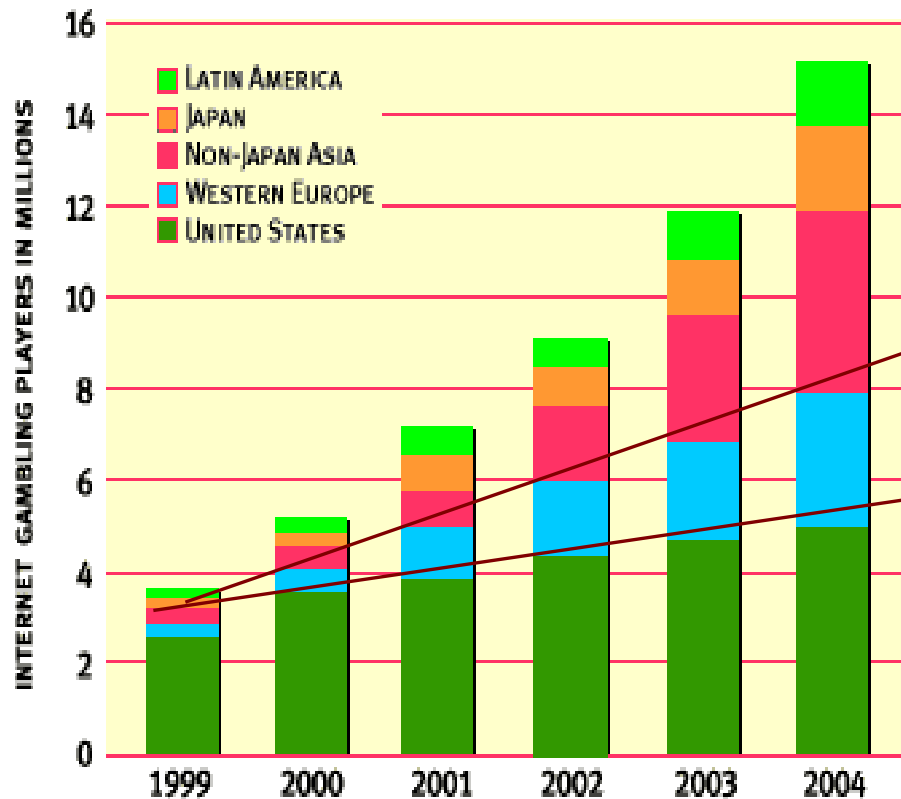
- 1,500 – 1,750 games/sports sites
- 750 companies
- 2002 – \$2.0 - \$3.0 billion total market
- 2002 – U.S. Market = 60% of worldwide market
- Growing Western European market



# Where the Customers Are



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SOURCE: Christiansen Capital Advisors, LLC; River City Group

Western Europe  
market growth  
more rapid than  
U.S. growth

# Marketing

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NEWYORK

- Compelling brand recognition, credibility, personality
- Ability to attract strong partners –  
Virgin, British Telecom, BSkyB, Yahoo!, MSN
- Ability to tie marketing programs directly to world-class resort experience
- Brand extension / International development



PLAYTREASURE ISLAND.COM

# Isle of Man

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- Committed to creating stringent regulatory regime
- Will not allow operators to accept U.S. bets
- Reputational risk – stakeholders
  - MGM MIRAGE, Littlewoods, Sun International, Rank, Action Online Entertainment
- Low tax structure
- Great technology infrastructure / financial institutions
- £2 million operator bond



# Isle of Man



# Regulatory Oversight

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- Isle of Man Gambling Control Commission – Licensed September 2001
- Michigan Gaming Commission & Gambling Control Board
- Mississippi Gaming Commission
- Nevada Gaming Commission and Gaming Control Board
- New Jersey Div. Of Gaming Enforcement and Casino Control Commission
- United Kingdom: Great Britain Gaming Board

# Regulatory Oversight

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- **Key Issues**
  - Jurisdictional control
  - Age verification
  - Responsible gambling
  - System security
  - “Know your customer” practices



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# Statement of Claims

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- Isle of Man Regulations
- Industry best practices
- Internal Controls and Operating Procedures (ICOPS)
- Attached in Appendix

# Jurisdictional Overview

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## Process:

- Various legal opinions – 40 countries
- Govt. Affairs audit – 10 countries
- Extensive industry / competitive review
- Open dialogue with appropriate governmental agencies



# Jurisdictional Overview

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PLAYBEAURIVAGE.COM

## Rules:

### Non-viable

- Where gambling is explicitly illegal
- Where interactive gambling is explicitly illegal
- Where licensing and governmental authorization of interactive gaming is required and not yet obtained
- Where regulatory oversight gaming bodies have restricted
- Where restricted by U.S. or IOM trade restrictions
- Where appropriate governmental/regulatory bodies have asked us to cease activities

# Jurisdictional Overview

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PLAYBEAURIVAGE.COM

## Rules:

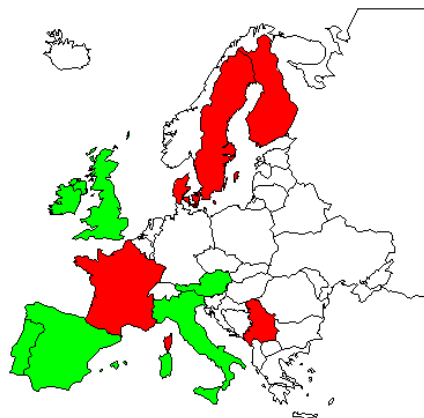
### Viable

- Where law enables
- Where supporting legal opinions and proper due diligence provide access
- Where historical industry and governmental activities have not prohibited
- Commercial market opportunity



PLAYBEAURIVAGE.COM

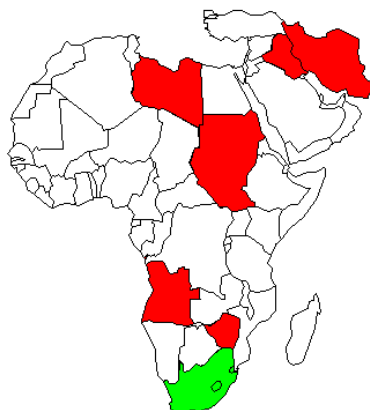
# Viable Jurisdictions



**Viable:** United Kingdom, South Africa, Spain, Portugal, Ireland, New Zealand, Italy, Isle of Man, Sweden



**Not Viable (at this time):** China, United States, South Korea, Japan, France, Australia, Denmark, Hong Kong, Finland, Cuba, Myanmar, Iran, Iraq, Libya, North Korea, Sudan, Angola, Yugoslavia, Zimbabwe, Netherlands, Canada, Serbia



 Viable

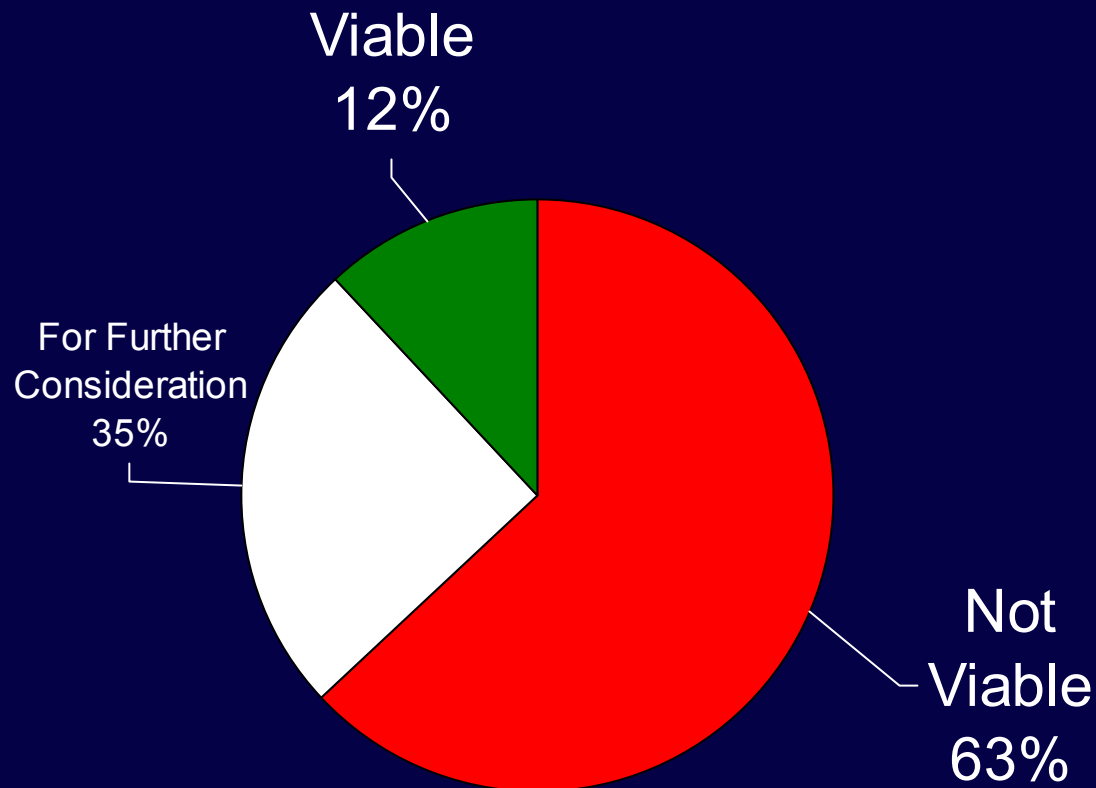
 Not Viable

# Viable Jurisdictions



PLAYBEAURIVAGE.COM

## Percentage of 316 million Total Internet Users





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# Statement of Claims

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- Isle of Man Regulations
- Industry best practices
- Internal Controls and Operating Procedures (ICOPS)

# Age / Geo-verification

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- Rules-based weighting system
- Layered approach to verification
  - Maximize provider core competencies
  - Minimizes provider points of vulnerability
- Delivery of “reasonable assurance”
- No single solution is perfect

## Design Objectives:

- Provide best possible reasonable assurance that players will be of lawful age and communicating only from jurisdictions where it is lawful
- Easily scalable allowing components to be added or subtracted over time

## Result:

- A rules based scoring engine that validates a player's location, identity and age by comparing information given at registration with numerous data sources

## Data Source Providers



### Currently Integrated in Module for Launch:

#### Internet Protocol (IP) mapping company

- Location



#### Personal Information Data Source Provider with Multi-Country Reach

- Identity, Age and Residence



#### Personal Information Data Source Provider with U.K. Expertise

- Identity, Age and Residence



#### Credit Card Fraud and Risk Assessment Company

- Identity



#### Credit Card Bank Identification Number Database

- Location, Identity
- 



### Under Evaluation (2nd Sources):

#### Internet Protocol (IP) mapping company

- Location



#### Personal Information Data Source Provider with Multi-Country Reach

- Identity, Age and Residence



#### Personal Information Data Source Provider with U.K. Expertise

- Identity, Age and Residence



#### Credit Card Fraud and Risk Assessment Company

- Identity

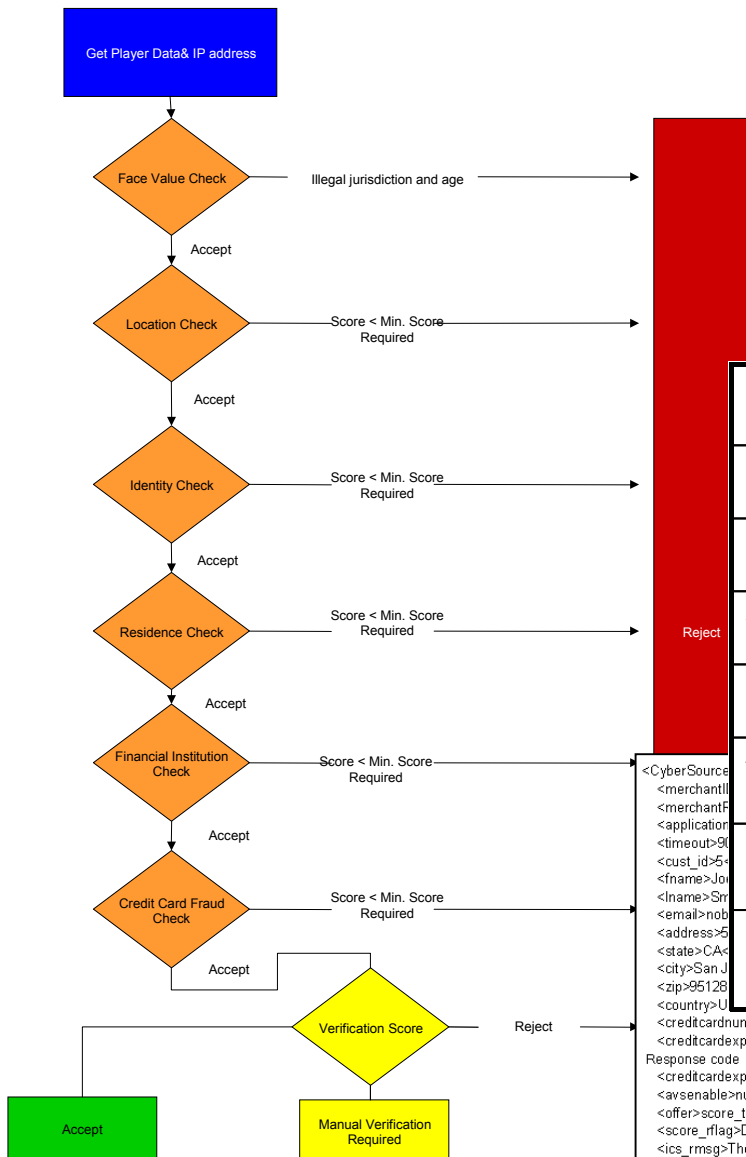


# Data Source Provider Databases:

- Voters Roll
- Government Issued Identification
- Credit Bureau Identity Information
- Drivers License Registration
- Visa Transactions
- Neural Network
- Postcode Address File
- Credit Account Information Sharing
- Detect (proprietary - Experian)
- UK Telephone Directory
- MOSAIC (proprietary – Experian)
- Public Information File
- CAIS
- CAPS
- The Associations and Alias File
- CIFAS
- Detect
- Address Linking

# verification module

## Process Flow



- Face Value Check
- Location Check

Data from GeoPoint	Value Used in Location Check	Based on:	Example
IP Type	Mapped or Not Mapped	Data directly from GeoPoint	GeoPoint returns <i>mapped</i> , Location Check uses it directly
Country	Legal or Illegal	Location Check compares a list of legal online gambling jurisdictions defined in WagerWare database to the country value returned by GeoPoint	GeoPoint returns <i>USA</i> , Location Check uses internal list of legal online gaming jurisdiction to determine that <i>USA</i> is <i>illegal</i>
Connection type	Dial-up or Non Dial-up	Location Check translates connection parameter returned from GeoPoint into Dial-up/Non Dial-up	GeoPoint returns <i>Cable</i> , Location Check determines that it is <i>Non Dial-up</i>
Message	AOL or Non-AOL	Message parameter returned from GeoPoint	GeoPoint returns <i>AOL</i> , Location Check determines that it is <i>AOL</i>

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Legal	Different/Legal	Unknown	0010	TBD
Legal	Different/Illegal	Unknown	0011	TBD
Legal	Same/Legal	Unknown	0012	TBD
Illegal	Irrelevant	Irrelevant	0013	TBD

### VERIFICATION SCORING

Verification Scoring Consists of Several Steps:

- Translate the required Result Codes into various Check Scores
- Weight the Check Score (assuming the score is above the minimum required)
- Add weighted Check Scores together for all checks
- Determine a Verification Action based on the total Verification Score

The Consolidated Verification Score is Used to Place the Potential Player in One of the Following Three Action Categories Based on an Operator Determined Metric:

- Accepted
  - Potential Player is Registered
- Rejected
  - Potential Player is Not Registered
- Manual Verification Required
  - Potential Player is placed

Verification Checks	Check Scores	Weights	Verification Score
<i>Example 1</i>			
Location	65	15%	9.75
Identity	50	25%	12.5
Residence	75	30%	22.5
Financial Institution	80	10%	8
Credit Card Fraud	80	20%	16
Total		100%	68.75
<i>Example 2</i>			
Location	65	20%	13
Identity	50	20%	10
Residence	75	20%	15
Financial Institution	80	20%	16
Credit Card Fraud	80	20%	16
Total		100%	70

Range of Consolidated Verification Scores	Result
0-50	Rejected
51-75	Manual Verification Required
76-100	Accepted

### MANUAL VERIFICATION

Through a User-Friendly Web-based Interface, the Manual Verification Module Allows the Operator to:

- Comply with regional regulations
- Manage risk
- Increase revenue by streamlining the process of confirming the validity of player supplied credentials and converting potential players into customers

The Manual Verification Administrative Interface Allow an Operator's Customer Support Representative to:

- Search related tasks
  - Search by Score Range
  - Search by Surname, Forename, DOB, Country, Registration Date
- Examine the search related tasks
  - Review more detailed information
  - Review list of records that met search criteria
- Review and edit account management details
  - Player personal details
  - Review verification data
  - Append notes to file
  - Review archive notes
- Manage player supplied documentation
  - Review and edit document status and document #'s
  - Review document action dates
- Change player status from 'Manual' to 'Accepted' or 'Rejected'
- Send E-mail

Manual Verification Customer Detail

Verification > Manual Verification > Manual Verification Customer Detail

brief instruction

Personal Details

Surname: data

Forename: data

Date of Birth: data

Address 1: data

Address 2: data

City: data

Zip: data

Country: data

Credit card no.: data

Email: data

Security Question: data

Security Response: data

Telephone: data

Fax number: data

Mobile phone: data

Edit

Verification

Verify Group Code	Score	Description
Location Verification	data	data
Age Verification	data	data
Residence Verification	data	data
Risk Assessment	data	data
Financial Institution Check	data	data

Archive Notes

Call Date	Notes	Created By
data	data	data
data	data	data
data	data	data

Documentation

Document Name	Status	Received Date	Document No.	Action Date
data	Accept	data		data
data	Accept	data		data
data	Accept	data		data

User Notes

Email

Cancel

Update

Status

☐ Accepted
 ☐ Rejected
 

Submit

# Responsible Gambling

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- Partners
  - GamCare
  - Gamblers Anonymous
  - Internet Content Rating Association



The Best of  
**LAS VEGAS ONLINE!**



**ENTER THE  
CASINO**

NO DOWNLOADS REQUIRED



**PLAY FOR  
FREE**



**£100  
WELCOME  
BONUS**  
**CLICK HERE!**

USERNAME:

PASSWORD:

**LOGIN**

[Login Problem](#)

[Forgot Password](#)

[Open Account](#)

[Getting Started](#)

[Golden Nugget](#) [Treasure Island](#) [Bellagio](#) [New York New York](#) [MGM Grand](#) [The Mirage](#) [Beau Rivage](#) [Primm Resorts](#)



# RESPONSIBLE GAMBLING

[About Us](#) [Contact Us](#) [Policies](#) [Responsible Gambling](#) [Help](#)

ENTER THE  
CASINO  
NO DOWNLOADS REQUIRED

## Page Contents

<a href="#">Player Protection</a>	<a href="#">Underage Gambling</a>
<a href="#">Third Party Associations</a>	<a href="#">Content Filtering</a>

MGM Mirage Online is committed to responsible gambling, and has designed its system in a manner that reduces the opportunities for impulse transactions to be made, limits available funding, and provides the opportunity for support.

The following features have been put in place to aid responsible gambling:

- Third party link to GamCare and Gamblers Anonymous
- Self Help and Awareness section
- Player configurable control monitors for number of visits and playing time by day, week, and month
- Player configurable stake limits
- Player configurable loss limits
- Player configurable deposit limits
- Self Exclusion
- Operator Exclusion

It is our goal to encourage responsible gambling, and keep your experience at PLAYMGMMIRAGE safe, fun and entertaining.

## Player Protection

At PLAYMGMMIRAGE, several features are available to help your play to remain responsible. After successful login, you can manage your play (Player Protection page), through the use of the following player configurable options:

Stake Limits - The ability to set limits on the total amount you can stake per day, per week and per month.

Loss Limits - The ability to set limits on how much you can lose per day, per week and per month.

Deposit Limits - The ability to set limits on how much you can deposit per day, per week and per month.

Session Time - You can also set the maximum duration for session play in minutes.

Self-Exclusion - We provide you with the ability to self-exclude yourself for 7 days (cooling off period). You can also request to be self-excluded indefinitely by contacting us directly at [customerservice@playmgmmirage.com](mailto:customerservice@playmgmmirage.com). Once a player self-excludes himself/herself for the third time, PLAYMGMMIRAGE will exclude the player from the site indefinitely. We also reserve the right to exclude any player at any time.



## Edit Your Profile

Welcome **SUMIT590**, to  
PLAYMGMMIRAGE.COM and  
the Best of Las Vegas  
Online.

[Change Password](#) [Change Pin](#)



In addition, MGM MIRAGE Online has adopted a [Code of Conduct](#) and [Privacy Policy](#) to show our members our commitment to establishing relationships built on credibility and trust.

[ [Top](#) ]

### Third Party Associations

MGM MIRAGE Online has acknowledged GamCare and Gamblers Anonymous as leaders in the area of responsible gambling.



MGM MIRAGE Online shares GamCare's commitment to promoting responsible attitudes towards gambling and working for the provision of proper care for those who have been harmed by a gambling dependency.

We have designed our systems and operational procedures to complement GamCare's online gambling social responsibility platform as outlined below, and have received distinct recognition by GamCare as a leader in online gambling social responsibility. Click [here](#) to view the acknowledgment letter

from GamCare.

1. Age verification system in financial transactions
2. Additional check on debit cards that are issued by banks to those potentially under the legal age
3. Advertising and promotional material that does not target those under the age of 18, is honest, fair and is not misleading
4. Player configurable stake limits, deposit limits, loss limits per day, per week and per month and session duration in minutes
5. A "one instrument" policy is in place, where a customer can deposit money into their account using one instrument only. Customers will have to wait 24 hours (cooling off period) before they can deposit funds using another instrument
6. Links on every page for easy access to responsible gambling and player protection sections to assist players with keeping their gambling under control
7. Our home page carries logos and links to GamCare and Gamblers Anonymous for immediate access to information and assistance
8. Notices and links to GamCare's helpline throughout the site
9. No encouragement of players to chase losses
10. Players can easily set time limits or exclude themselves for a period of time
11. Players can easily self-exclude themselves for seven days, or indefinitely by contacting us directly
12. Our Play for Free casino contains the same responsible gambling links as our play for cash casino
13. Our staff are trained and educated on Responsible Gambling and Player Protection controls
14. Our company has adopted a socially responsible approach, as demonstrated above
15. Our site promotes trust, credibility and regulation in an effort to drive the industry towards social responsibility
16. Our company has partnered with GamCare and supports their treatment programs, training and education for those at risk and young gamblers
17. In developing new technologies and products, we will consult with GamCare and other organisations on any potential societal impacts

According to GamCare, most people who gamble keep control of what they are doing and remain 'social gamblers'. However a number of people lose control and, for them, gambling becomes a problem.

If you are concerned that gambling may have taken over your or someone else's life then the following questions below may help you to find out.





PLAYTHEMIRAGE.COM

# Player Protection

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- Player configurable stake, deposit, session time and loss limits
- Self help and awareness section
- Self-exclusion
- Operator exclusion
- Links to GamCare, ICRA, Gamblers Anonymous
- Code of Conduct

## PLAYER PROTECTION

[About Us](#) [Contact Us](#) [Policies](#) [Responsible Gambling](#) [Help](#)[My Account](#) [Deposit](#) [Withdrawal](#) [Player Protection](#)

## Page Contents

<a href="#">Self Exclusion</a>	<a href="#">Loss Limits</a>	<a href="#">Withdrawal Limits</a>
<a href="#">Stake Limits</a>	<a href="#">Deposit Limits</a>	<a href="#">Maximum Session Time</a>

In order to promote responsible gambling and protect our customers, MGM MIRAGE Online provides our members with the option of setting limits to ensure the gaming experience remains safe, fun and entertaining.

You may set any combination of limits. Each time a limit is decreased, the change will take effect immediately. However, each time a limit is increased, it will not take effect for 7 days.

## Self Exclusion

## Total

After self-excluding yourself three times, you are excluded from the site permanently. If you would like to exclude yourself indefinitely, please [Contact Us](#).

## Self exclusion in days

[EXCLUDE ME FOR 7 DAYS >>](#)[\[ Top \]](#)

## Stake Limits

## Total

Total Stake is the total amount of all the bets you place.

## Total stakes per day

## Total stakes per week

## Total stakes per month

[\[ Top \]](#)

## Loss Limits

## Total

Total loss is the amount of funds that you have lost.

## Total Losses per day

## Total Losses per week

## Total Losses per month

[\[ Top \]](#)

## Deposit Limits

## Total

## Maximum deposit per day



## Edit Your Profile

Welcome **SUMIT590**, to  
PLAYMGMMIRAGE.COM and  
the Best of Las Vegas  
Online.

You last logged in on: Thu  
Aug 01 22:01:02 2002 UTC

[Change Password](#) [Change Pin](#)

Maximum deposit per week	<input type="text" value="200.00"/>
Maximum deposit per month	<input type="text" value="300.00"/>
<a href="#">[ Top ]</a>	
Withdrawal Limits	Total
Maximum withdrawal per day	<input type="text" value="400.00"/>
Maximum withdrawal per week	<input type="text" value="500.00"/>
Maximum withdrawal per month	<input type="text" value="950.00"/>
The following limits will be changing:	
Total Daily Withdrawal Limit: \$500.00 on 2002-08-07 18:49:30	
Total Weekly Withdrawal Limit: \$600.00 on 2002-08-07 18:50:58	
Total Monthly Withdrawal Limit: \$990.00 on 2002-08-07 18:50:58	

SUBMIT >>

<a href="#">[ Top ]</a>	
Maximum Session Time	Total
Maximum session time in minutes	<input type="text" value="50"/>
SUBMIT >>	

[\[ Top \]](#)

If you experience any problems, or have any questions about our Player Protection program, please feel free to [Contact Us](#).

# Partners

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PLAYTHEMIRAGE.COM

## Probity

- No acceptance of online wagers from the U.S., in any form, by all partners and suppliers
  - No direct involvement in U.S. wagers
  - No royalty streams from sites that accept U.S. wagers
  - No site development or software development for any site that accepts U.S. wagers
  - No NewCo restructuring schemes

# GGG – Systems Certification

- ✓ Founded 5 years ago, GGS is a global company that has international recognition as the world leader in Internet Gambling regulations, security and operational compliance.
- ✓ Essentially, GGS is the interface between the supplier, operator and the regulator.
- ✓ Selected lab in Nevada

## GGG

- ✓ GGS does not operate in unregulated markets. Our contracts contain an extensive compliance clause.
- ✓ GGS is the only Accredited Testing Facility to have had its test procedures and scripts audited by regulatory bodies to ensure integrity and technical competency.
- ✓ ISO9002 quality certified.



FIRST in the WORLD to obtain international software testing accreditation – Australia Federal Government Pilot Program: Due diligence and Audit trails.



# Regulated Risk Management

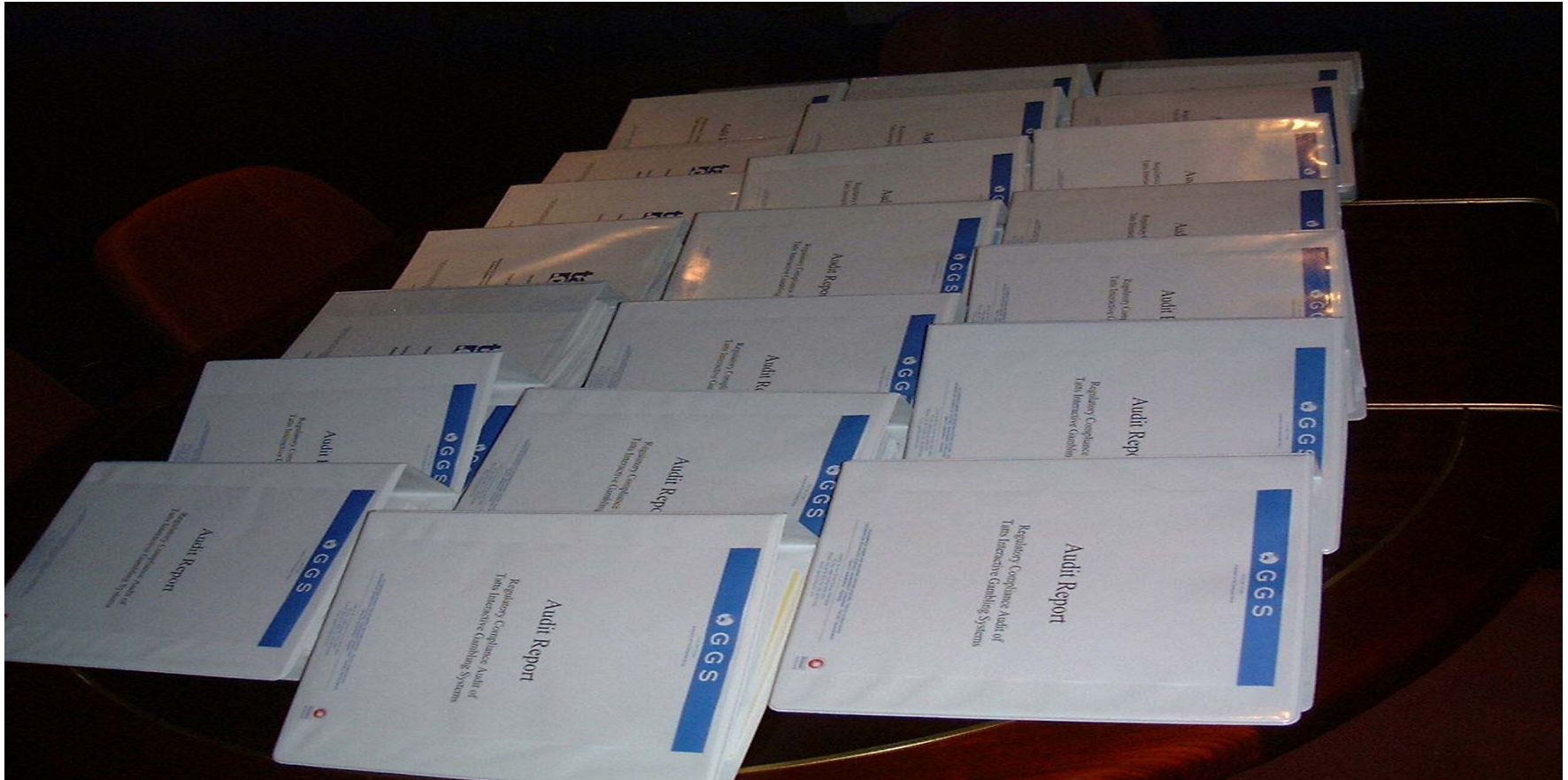
- ✓ Government considers the technical and operational risks.
- ✓ Sets requirements and guidelines.
- ✓ Licensee must make statement of claims of compliance or provide alternate solutions to either mitigate risk, or claim exemption.
- ✓ Licensee's claims are tested for compliance.
- ✓ Risk based inspection and audit programs based on operator risk profile.



# Regulated Risk Management

- ✓ The key known risks to be mitigated have been laid down in the regulatory “requirements” framework, and the final scope of compliance is set by an agreement of the risk mitigation strategies (The Claims) between the Operator and the Regulator.
- ✓ Audit trails are maintained.
- ✓ Due Diligence is demonstrable.
- ✓ **Approach taken to MGM MIRAGE Online Testing.**

# Final Reporting



# Physical Site Security



PLAYMGMGRAND.COM

- MANX Class A ISP Facility
- 24X7 Guarded operation
- Video surveillance
- Carded gate entry
- Redundant site backup



# Remote Systems Management



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NEWYORK

- Centralization
- Specialization
- Automation



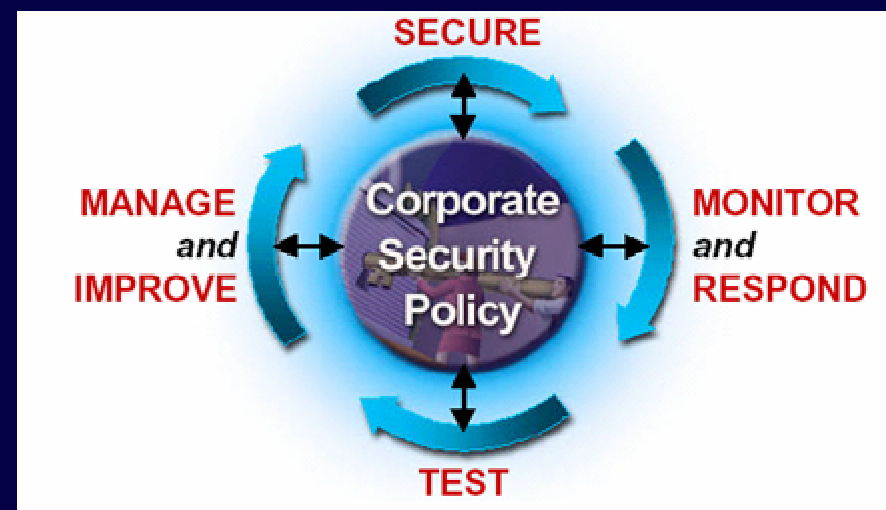


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# Security Components

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- Corporate Security Policy
- Identity
- Perimeter Security
- Secure Connectivity
- Security Monitoring
- Security Management



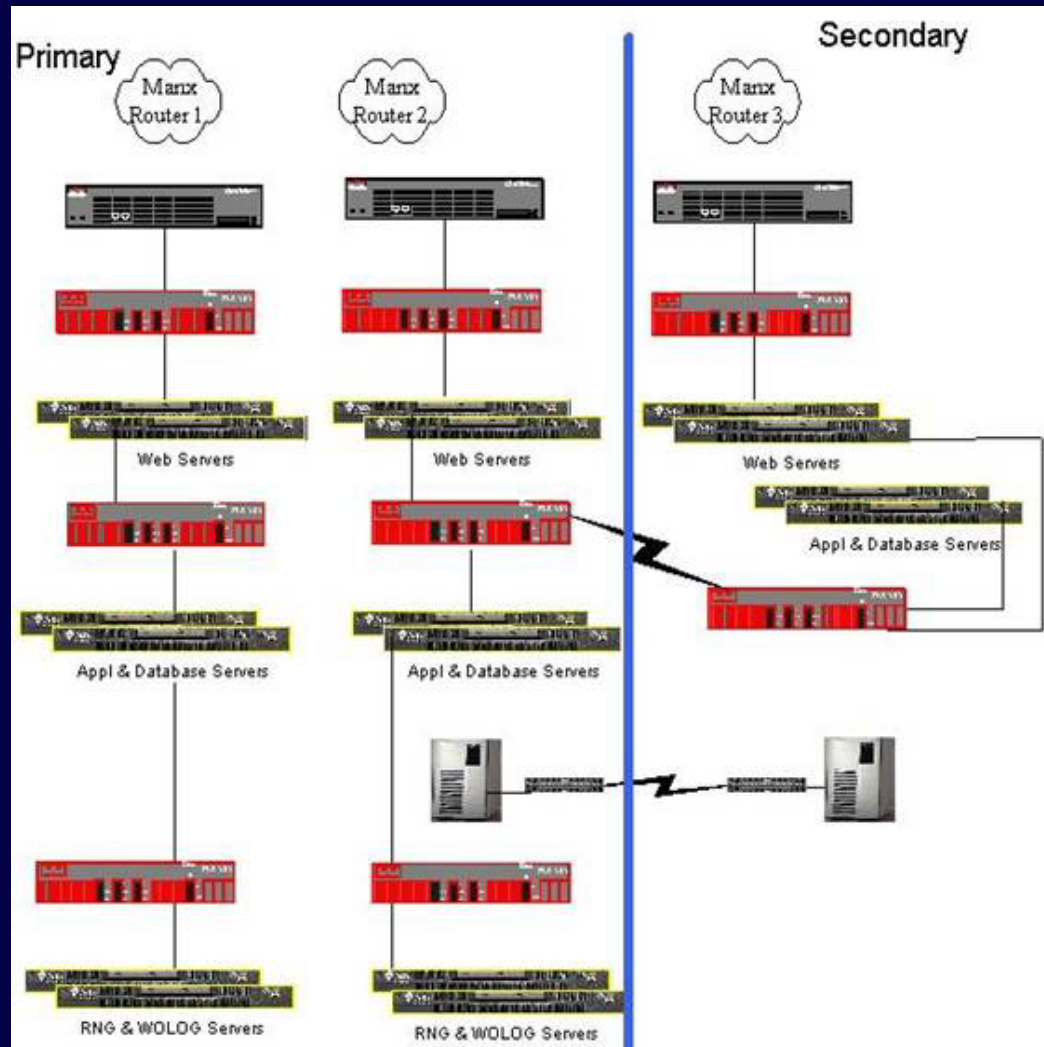


# Security Technologies - Prevention



PLAYMGMGRAND.COM

- Network Design
- Firewalls
- Virus Prevention

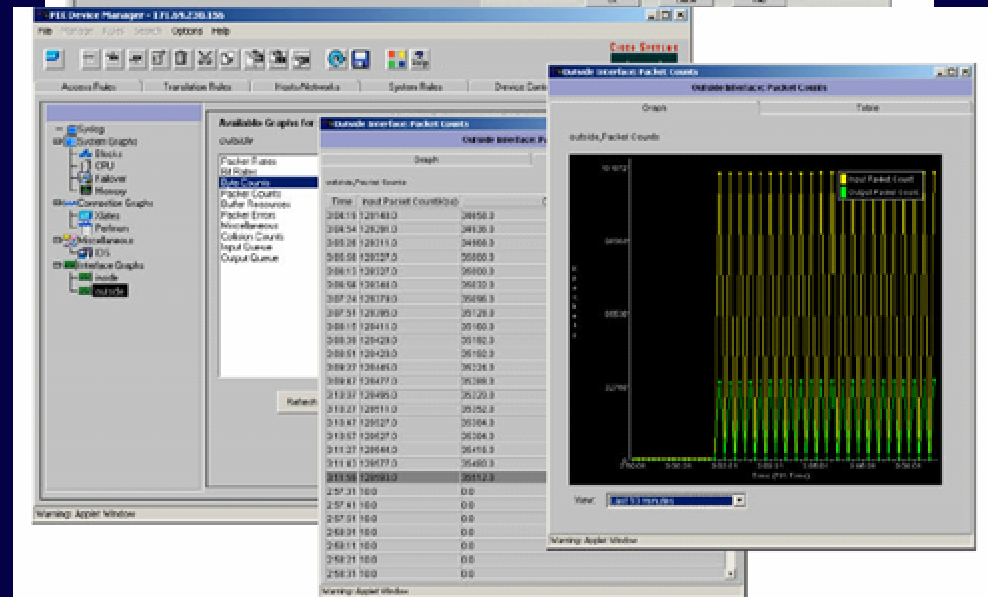
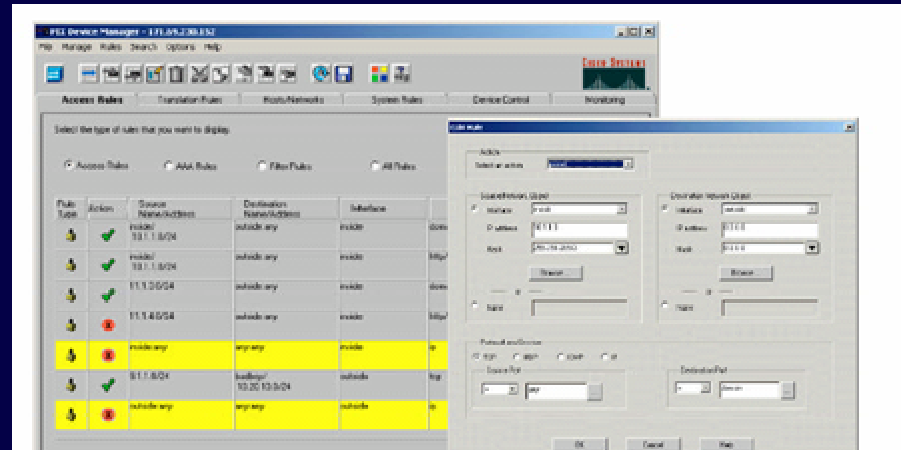


# Awareness



PLAYBEAURIVAGE.COM

- Intrusion Detection Systems
- 24x7 monitoring/escalation
- Vigilance



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# MGM MIRAGE™

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## O N L I N E

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# **Appendix**

## **MGM MIRAGE Online Statement of Claims**

Source	Index #	Description	IOM Regulation	Action	Provided By:	WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
This column designates where the claim is derived from, i.e. whether it is satisfying an Isle of Man regulation, a standard from our internal certification expert, GGS, or other standard.	For ease of reference, each claim was given an index number, beginning with the number one.	This column presents the MMOL claim, such as a description of what will be submitted in our Internal Controls and Operating Procedures (ICOP) manuals, or the level of regulation or compliance MMOL expects to achieve for the control or procedures.	This column cross-references MMOL's index number with the corresponding Isle of Man regulation.	This column describes the steps that need to be taken in completing the Internal Controls and Operating Procedures (ICOP) manuals and/or achieving the level of compliance within the system.	The party or parties responsible for completing each task are stated herein	This column references the section in which you will find information on the stated claim in WagerWorks' (WW) Internal Controls and Operating Procedures Manual (ICOP). As MMOL's games and system developer, they will be submitting a separate ICOP for review.	This column states the section in which you will find information on the stated claim in the MGM MIRAGE Online Internal Controls and Operating Procedures (ICOP) manuals.	If there is other documentation that refers to the claim, other than the Internal Controls and Operating Procedures (ICOP) manuals, it is stated here.	This column is used for internal notes to MMOL.
GGs Requirement	1	MMOL will provide a brief overview of the legal system within which the organization operates and highlight any issues of importance.		Update	WW and MGM MIRAGE	Section 41 Security	1-3.1		
IOM Regulation / GGs Requirement	2	Software Controls -The ICOP submission will contain a section on compliance with legal requirement which details the system to avoid breaches of criminal and civil laws in all jurisdictions in which MMOL operates.	297-01(10)	Update	MGM-MIRAGE		1-3.12 & 7-3.2.1.1		
GGs Requirement	3	MMOL will provide a list and make references to any Acts with which the organization will comply and reference any Authorities who will monitor the organization's operations.		Update	WW and MGM MIRAGE	Section 41 Security	1-3.2		IOM Online Gambling Regulation Act of 2001; NV, MI, MS, NJ
GGs Requirement	4	MMOL will provide approval requirements, probity checks, restrictions on employees, and an employee handbook		Update	WW and MGM MIRAGE	Section 7 Authorization and Section 41 Security	1-3.4 & 2-1.7		
GGs Requirement	5	MMOL will provide a brief description of Co. history, commencement date, structure, general overview of the goals and objectives of the company		Update	WW and MGM MIRAGE	Section 13 Environment	2-1.1	MMOL BP Mission	
GGs Requirement	6	MMOL will also identify all significant equity, non-equity and loan capital provided by parent and associated companies and investors, together with details of any repayment terms and security given.		Update	WW and MGM MIRAGE	Section 13 Corporate Environment	2-1.1	MMOL BP Corporate Structure	
GGs Requirement	7	MMOL's Corporate Structure section will state the country of incorporation or residence of these parties .		Update	WW and MGM MIRAGE	Section 13 Corporate Environment	2-1.1.4	MMOL BP Corporate Structure	
GGs Requirement	8	MMOL will provide a diagrammatic representation of the corporate structure, in particular demonstrating the relationship with parent, sub, and associated companies		Update	WW and MGM MIRAGE	Section 13 Corporate Environment	2-1.1.4	MMOL BP Corporate Structure	
GGs Requirement	9	Details of any other gambling operations currently or previously carried out by the applicant or its parent, sub or associated companies will be identified.		Update	WW and MGM MIRAGE	Section 2 Mission and Section 13 Environment	2-1.2	MGM Annual Report	
GGs Requirement	10	Notification of any changes to job descriptions and/or the responsibilities that attach to a position will be given to the Commission and approval granted prior to the implementation of any change.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.3.4		
GGs Requirement	11	ICOP submission will contain a chart showing the organizational structure including reporting lines.		Update	WW and MGM MIRAGE	See Org chart	2-1.3.4	MMOL BP Organizational Structure	
GGs Requirement	12	Job description will contain the titles of the position(s), which report to this position.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.4	Job Descriptions	
GGs Requirement	13	Accompanying this Org Chart will be a delegation list detailing the decision-making and control responsibilities of each employee who is in a position to exercise influence over or with respect to the operation of the licensee's operations.		Update	MGM-MIRAGE		2-1.4	MMOL BP Organizational Structure	
GGs Requirement	14	The information provided in the job descriptions will be sufficiently comprehensive so as to easily identify key positions of influence.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.4	Job Descriptions	
GGs Requirement	15	Job Descriptions for each position containing, at a minimum the role/objective of the position.		Update	WW and MGM MIRAGE	See Org Chart and Section 45 Staffing	2-1.4	Job Descriptions	

Source	Index #	Description	IOM Regulation	Action	Provided By:	WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGs Requirement	16	Job Descriptions will contain the reporting relationships both internally and externally, including delegated authorities.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.4	Job Descriptions	
GGs Requirement	17	Job description will contain the major duties, controls and responsibilities of the position.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.4	Job Descriptions	
GGs Requirement	18	Job description will contain the knowledge, skills, qualifications and experience required to perform the duties of the position.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.4	Job Descriptions	
GGs Requirement	19	All job descriptions will be allocated a position number for ease of reference.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.4	Job Descriptions	
GGs Requirement	20	The licensee will provide details of the controls that exist to ensure that all staff members providing advice and assistance are suitably trained in the operations.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.5		
GGs Requirement	21	The procedures for identifying the need for staff training will be recorded together with the arrangements that are in place to provide such training.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.5		
GGs Requirement	22	A record of the review of such requirements together with the training undertaken will be maintained.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.5		
GGs Requirement	23	Details of the key external consultants will be included as part of the submissions.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.6		
GGs Requirement	24	Details will be submitted for consultants used specifically in relation to the betting application software and key financial systems and involvement.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.6	GGs Company Description	
GGs Requirement	25	MMOL will detail the organization's Code of Conduct to be followed by all employees highlighting key issues such as behavior, which may affect probity or possible actions, which may be regarded as a conflict of interest.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.7	Employee handbook	
GGs Requirement	26	Detail procedures that will be required to be followed with respect to the general office		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.7	Employee handbook	
GGs Requirement	27	Routine daily activities and sexual harassment policies and a statement on an equal opportunity working environment.		Update	WW and MGM MIRAGE	Section 45 Staffing	2-1.7	Employee handbook	
GGs Requirement	28	MMOL will have a designated person on duty at all times, who is authorized to act on behalf of the Licensee in urgent matters.		Update	MGM- MIRAGE	Section 45 Staffing	2-1.7		
GGs Requirement	29	Procedures for emergency situations such as bomb threat, fire evacuation, blackouts, flood evacuation riots, etc. will be described in this section.		Update	WW and MGM MIRAGE	Section 17 Emergency Procedures	3-1.0		
GGs Requirement	30	Premise procedures will include details of emergency power arrangements in the event of a main power outage so as to minimize the disruption to operations.		Update	WW and MGM MIRAGE (Operation and location)	Section 17 Emergency Procedures and Section 41 Security ICOPS	3-1.3		
GGs Requirement	31	A licensee will not conduct an authorized interactive gambling operation unless the place of operation and the location of the gambling system servers are in IOM and the Commission approves the premises where the system is housed.		Update	MGM- MIRAGE		3-2.0	Manx Telecom Documentation	
GGs Requirement	32	ICOP submission will contain a floor plan of the premises.		N/A	MGM- MIRAGE		3-2.1	Manx Telecom Documentation	
GGs Requirement	33	ICOP details of the security of the premises security alarm system, monitoring system including video surveillance and recording, lift access control as well as measures to ensure that security is maintained.		Update	WW and MGM MIRAGE (Operation and location)	Section 41 Security ICOPS	3-2.1.2	Manx Telecom Documentation	WW will do reference site; MMOL will do live site
GGs Requirement	34	Proximity to the Regulators		Update	MGM- MIRAGE		3-2.1.3		
GGs Requirement	35	Proximity to suppliers of IT, telecommunications and related products and services.		Update	MGM- MIRAGE		3-2.1.3		

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGIS Requirement	36	Proximity to services (consumables/business services/staff requirements)		Update	MGM-MIRAGE	3-2.1.3		
GGIS Requirement	37	Reliability of power and telecommunications in that region.		Update	MGM-MIRAGE	3-2.1.3		
GGIS Requirement	38	Bandwidth availability.		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	39	Ease of access to the building (parking/traffic considerations).		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	40	Who occupies adjacent buildings/offices.		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	41	Proximity to any outside agency that may present an unacceptable level of risk to business continuity.		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	42	Lightning Protection		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	43	Emergency lighting system in place		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	44	Redundancy of power and telecommunication feeds (switch to alternative sources)		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	45	Satellite access		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	46	Microwave line of sight		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	47	Off-line power facilities: UPS and generator power.		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	48	How often do generators require re-fueling and what arrangements are in place.		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	49	Are off-line power facilities manual or automatic switchover		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	50	How often are off-line power facilities tested		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	51	Secure Server Room		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	52	Compliance of server room to international standards		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	53	Access lifts or loading bays		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	54	Car park		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	55	Staff facilities		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	56	Sufficient Internal Cabling/wiring/outlets.		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	57	Fences?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	58	Security Guards? If yes, own or contracted?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	59	Access controls (electronic/physical)?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	60	Alarm Systems (panic buttons, detectors, etc.) and back to base monitoring?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	61	Response of security systems to power failure tested?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	62	Video surveillance of general premises/secure areas/approaches?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	63	Monitor personnel access to sensitive areas?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	64	Anti-surveillance measures (e.g. on site or remote listening devices, electronic surveillance of computer activity?)		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	65	Other tenants?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGIS Requirement	66	Contractors (especially cleaners)?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	67	Access to telecom and power distribution boards?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	68	Access to other plant and equipment rooms (elevator/air-conditioning)?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	69	Slab to slab walls?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	70	Quality of locks?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	71	Security level of doors/windows/fire escapes/delivery bays/other points of entrance?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	72	Fire suppression systems?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	73	The computer facility should have separate fire detection and suppression controls to the rest of the offices. What form of fire suppression is installed?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	74	Evacuation procedures?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	75	Does the building meet occupational health and safety requirements?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	76	How might the building chosen and the facilities of the building impact upon insurance and premiums?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	77	Earth Leakage Circuit Breakers?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	78	Body corporate rules regarding modification to the building?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	79	Floor space required based on extent of business located at this facility (call center, operations, IT, etc.)?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	80	What space has been designated to expansion?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	81	Adequate office space must be provided for operators next to the computer room (since operators will not work within the actual computer room)? Note: Cable will need to be patched from the computer room to the other offices, so it would be best that these run directly, and not through other offices en route.		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	82	For facilities that do not exist (fire equipment, security, generator, etc.) how difficult/costly/time consuming to install? Are the systems capable of expansion?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	83	State's requirements?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	84	Regulatory requirements?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	85	Choice of contractors?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	86	Lead-time to occupation?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	87	Does the business require a hot or cold disaster recovery capability?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	88	If hot, then to what extent does the selected disaster site mirror the production site?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	89	What secure off-site real-time logging and back-up facilities are in place?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	90	24 x 365 operation?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	91	Does the hosting company have a business continuity plan outlining how the business will be maintained in the event of a disaster?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	92	Does the hosting operator maintain security policies and procedures and generally acceptable internal controls and operating procedures.		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	93	What remote and/or physical access will you have and on what notice?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	94	What are the security measures in place to restrict access only to authorized personnel?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	
GGG Requirement	95	Do hosting staff and corporation pass probity requirements?		Update	MGM-MIRAGE	3-2.1.3	Manx Telecom Documentation	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	96	Premise procedures will include computer room security including access to the room		Update	WW and MGM MIRAGE (Operation and location)	Section 41 Security ICOPS	3-2.1.3 & 3-4.1.2	Manx Telecom Documentation
GGG Requirement	97	Personnel Security information will detail the employee's responsibility for information security, following the defined security policies		Update	WW and MGM MIRAGE	Section 41 Security ICOPS	3-3.1.1	
GGG Requirement	98	The submission of a User Training procedure will detail the training given to employees in relation to computer controls and security issues.		Update	WW and MGM MIRAGE	Section 41 Security ICOPS	3-3.2	
GGG Requirement	99	Premise procedures will include details of the procedures in place to control access to the premises (id cards)		Update	WW and MGM MIRAGE (Operation and location)	Section 41 Security ICOPS	3-4.1.1	
GGG Requirement	100	Secure Area procedures will detail the security controls including the physical access restrictions.		Update	WW and MGM MIRAGE	Sections 16, 29, 32, 33, 34, 41, 43, 44 ICOPS	3-4.1.1	
GGG Requirement	101	Secure area procedures will specify and detail the security arrangements of the hosting service and any supporting evidence in relation to stored servers located outside of premises.		Update	WW and MGM MIRAGE	Section 31 Offsite Storage, and Section 42 Servers ICOPS	3-4.1.3	
GGG Requirement	102	MMOL will have a privacy policy accessible from the player protection section of the responsible gambling page		Update	MGM- MIRAGE		4-10.1.1	
IOM Regulation	103	MMOL shall not disclose to any person —any information obtained by him on the registration of or opening an account with a player		Update	MGM- MIRAGE		4-10.1.2	
IOM Regulation	104	MMOL shall not disclose to any person —any information as to the state of a player's account, unless required by law, or made with the consent of the player	297-01(6.1)(b) & (6.2)(a,b)	Update	MGM- MIRAGE		4-10.1.3	
IOM Regulation / GGS Requirement	105	Player data will be protected in accordance with the Data Protection Act of 1986 & UK Data Protection Act of 1988 and principles of directive 94/46/EC	297-01(6.3)	Update	MGM- MIRAGE		4-10.1.4	
IOM Regulation / GGS Requirement	106	Suggested to follow EU privacy laws and /or OECD guidelines on the protection of privacy and transborder data flow of personal data.	297-01(6.3)	Update	MGM- MIRAGE		4-10.1.5	
GGG Requirement	107	Players will be informed when a cookie is being used		Update	MGM- MIRAGE		4-10.1.6	
GGG Requirement	108	Privacy policy will state that the gaming commission has access to the players info		Update	MGM- MIRAGE		4-10.1.7	
GGG Requirement	109	Privacy policy will state that the gaming commission has access to the black list and can ban them		Update	MGM- MIRAGE		4-10.1.8	
GGG Requirement	110	All player info will be erased not just deleted from all storage devices before the device is decommissioned		Update	MGM- MIRAGE		4-10.1.9	
IOM Regulation / GGS Requirement	111	Info on the players account will be kept confidential except where the release of that info is required by law	297-01(6.2)(a)	Update	MGM- MIRAGE		4-10.2.1	
IOM Regulation / GGS Requirement	112	Online registration info can only be accessed by the player, authorized staff, and the gaming commission	297-01(6.1)(a)	Update	MGM- MIRAGE		4-10.2.2	
GGG Requirement	113	Info about individual gaming behavior cannot be used to encourage irresponsible gaming		Update	MGM- MIRAGE		4-10.2.3	
IOM Regulation / GGS Requirement	114	A player offers consent by taking an action, and the transaction must be logged by the system	297-01(6.2)(b)	Update	WW and MGM MIRAGE		4-10.3.1	Page Specifications and Registration  Upon registration the player will select if they accept the terms and conditions and privacy policy. This acceptance is recorded in the database. If they decline they are not allowed to register
GGG Requirement	115	The default of consent will always be NOT to accept		Update	MGM- MIRAGE		4-10.3.2	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	116	Consent must be granted by the player where data is to be used for the purposes not directly related to gaming	297-01(6.2)(b)	Update	WW	4-10.3.3	Page Specifications and Registration	will get consent for; mailing list, monthly statement, promotions, etc...
GGG Requirement	117	Withholding consent in itself cannot be grounds for refusing to conduct business		Update	MGM-MIRAGE	4-10.3.4		
GGG Requirement	118	MMOL will provide details of procedures for resolution of complaints, including resolution notification to complainant and to the Commission.		N/A	MGM-MIRAGE	4-2.0		
GGG Requirement	119	Complaints may be received directly from players. The Commission may also receive complaints and these will be forwarded to MMOL.		N/A	MGM-MIRAGE	4-2.1		
GGG Requirement	120	Procedures for Player protection will be in place.		Update	WW and MGM MIRAGE	Comprehensive Functional Description	4-3.0	
GGG Requirement	121	All account related pages will have a link to the player protection page and a hotlink to a reputable problem gaming service		Update	MGM-MIRAGE		4-3.1.1 & 4-3.1.2	
IOM Regulation	122	MMOL's home page will contain: its full name and the address of its registered office	298-01(2.1)(a)	Update	WW and MGM MIRAGE		4-3.1.1a	
IOM Regulation	123	MMOL's home page will contain: the number of its online gambling license	298-01(2.1)(b)	Update	WW and MGM MIRAGE		4-3.1.1b	
IOM Regulation	124	MMOL's home page will contain: The date on which its license was originally granted	298-01(2.1)(c)	Update	WW and MGM MIRAGE		4-3.1.1c	
IOM Regulation	125	MMOL's home page will contain: a statement that online gambling is regulated in the IOM	298-01(2.1)(d)	Update	WW and MGM MIRAGE		4-3.1.1d	
IOM Regulation	126	MMOL's home page will contain: the IOM coat of arms	298-01(2.1)(e)	Update	WW and MGM MIRAGE		4-3.1.1e	
IOM Regulation	127	MMOL's home page will contain: hyperlinks to IOM govt and Gamblers Anonymous	298-01(2.1)(f)	Update	WW and MGM MIRAGE		4-3.1.1f	
IOM Regulation / GGS Requirement	128	On the player protection page: Links to responsible gambling services	297-01(3.3)				4-3.1.1f & 4-3.1.2d	
IOM Regulation	129	MMOL's home page will contain: a hyperlink to a page summarizing arrangements for registration	298-01(2.1)(g)(i)	Update	WW and MGM MIRAGE		4-3.1.1g	
IOM Regulation	130	MMOL's home page will contain: a hyperlink to a page stating that persons under the age of 18 are not permitted to register or to participate in online gambling	298-01(2.1)(g)(ii)	Update	WW and MGM MIRAGE		4-3.1.1h	
IOM Regulation	131	MMOL's home page will contain: a hyperlink to a page stating that online gambling debts are enforceable in law in IOM	298-01(2.1)(g)(iii)	Update	WW and MGM MIRAGE		4-3.1.1i	
IOM Regulation	132	MMOL's home page will not imply that online gambling is regulated in the United Kingdom	298-01(2.2)	Update	WW and MGM MIRAGE		4-3.1.1j	
IOM Regulation / GGS Requirement	133	On the legal page: MMOL will provide advice and information on responsible gaming along with a link to more information	297-01(3.3)	Update	MGM-MIRAGE		4-3.1.2a	
IOM Regulation / GGS Requirement	134	On the player protection page: Provide a list of all the measures a player can invoke and an option to invoke them	297-01(3.3)	Update	MGM-MIRAGE		4-3.1.2b & 4-3.5	
IOM Regulation / GGS Requirement	135	On the player protection page: A link to an industry accepted and simple "self-assessment" process to determine at risk potential	297-01(3.3)	Update	MGM-MIRAGE		4-3.1.2c	
GGG Requirement	136	On the player protection page: A link to a recognized filtering program to enable players to configure their computers with an intent to prevent access by minors		Update	MGM-MIRAGE		4-3.1.2e	
GGG Requirement	137	On the player protection page: A link to the terms and conditions		Update	MGM-MIRAGE		4-3.1.2f	
GGG Requirement	138	On the player protection page: a link to the privacy policy		Update	MGM-MIRAGE		4-3.1.2g	
GGG Requirement	139	On the player protection page: An easy and obvious mechanism to advise the player of the right to make a complaint against the licensed Operator, and to enable the player to notify the Commission of a complaint.		Update	MGM-MIRAGE		4-3.1.2h	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
IOM Regulation / GGS Requirement	140	On the player protection page: A link to the player's account statement	297-01(8)(b)	Update	MGM-MIRAGE	4-3.1.2i		
GGS Requirement	141	MMOL will select a credible third party responsible gaming service		Update	MGM-MIRAGE	4-3.1.2k		
GGS Requirement	142	Player protection page will be readily accessible from any page		Update	MGM-MIRAGE	4-3.1.2l		
GGS Requirement	143	No game play may occur where the links used to supply information on the player protection or responsible gambling are not displayed or are not operational		Update	MGM-MIRAGE	4-3.1.2m		
GGS Requirement	144	All links to third party responsible gaming sites are to be tested and in working order. If the site is not longer available an alternative site is required.		Update	MGM-MIRAGE	4-3.1.2n		
IOM Regulation / GGS Requirement	145	Schedule will be available to the player on information about the statistical percentage return to the player. Strategy games will have a range and a qualification that the return depends on the strategy used.	296-01(6)(f)	Update	WW	4-3.2.1		
GGS Requirement	146	Schedule will be available to the player on information about the statistical percentage return to the player. A slot type game may have a deviation and expected return after a specified number of games.		Update	WW	4-3.2.2		
GGS Requirement	147	Player return for a game will be shown demonstrably, as well as theoretically, to not be less than the published regulatory minimum for that game, if one is set.		Update	WW	4-3.2.3	PC Sheets and Histogram	
GGS Requirement	148	Where a progressive prize is offered, it will be implemented such that the base return + startup return + increment rate of the progressive ensures that the theoretical minimum return is correctly represented to the player		Update	WW and MGM MIRAGE	4-3.2.4		
GGS Requirement	149	A player will be provided with the option of selecting the duration of a session at the commencement of that session and be able to set a duration as the default. This "opt-in" procedure can limit wagers and deposits in an effort to deter problem gambling.		Update	WW and MGM MIRAGE	4-3.3.1	Player Account Management Functional Specification	
GGS Requirement	150	The alteration of the session duration settings cannot apply to the current session. Once a player opts into a session he cannot change the time period for that session.		Update	WW and MGM MIRAGE	4-3.3.2	Player Account Management Functional Specification	
GGS Requirement	151	The session limits will be accessible from the player protection page		Update	WW and MGM MIRAGE	4-3.3.3	Player Account Management Functional Specification	
GGS Requirement	152	When the game supports multiple paylines, then a message indicating wins on different paylines will be added or the equivalent is to be displayed.		Update	WW and MGM MIRAGE	4-3.3.6.5.10	Game Functional Specifications	
GGS Requirement	153	Where the game supports scatters, a message indicating that scattered wins are added to payline wins or equivalent, is to be displayed if this is the rule of the game.		Update	WW and MGM MIRAGE	4-3.3.6.5.11		
GGS Requirement	154	Treatment of coinciding scattered wins with respect to other possible scattered wins will be clearly stated		Update	WW and MGM MIRAGE	4-3.3.6.5.12		
GGS Requirement	155	Where mixed symbol prizes are paid, the treatment of prizes that may be interpreted to be both mixed and straight winners will be described.		Update	WW and MGM MIRAGE	4-3.3.6.5.13		
GGS Requirement	156	Upon a win, all paylines will be clearly indicated. If it is possible to bet more than 5 lines, then upon a win for video machines, the paylines will be indicated in a manner such that all paylines can be clearly identified by the player.		Update	WW and MGM MIRAGE	4-3.3.6.5.8	Game Functional Specifications	
GGS Requirement	157	A description of what patterns will be paid will be clearly displayed when a payline may be interpreted to have more than one individual winning pattern.		Update	WW and MGM MIRAGE	4-3.3.6.5.9		
GGS Requirement	158	When a player logs into the system the last time they logged in is to be displayed in the profile information section. Last login time will be displayed in UTC. The purpose of last login display is to enable the player to see if someone has logged in with their account without their knowledge.		Update		4-3.4.1	Player Account Management Functional Specification	
GGS Requirement	159	On the site there will be warnings to let the players know that we will keep their login and password confidential and that there are mechanisms in place to detect unauthorized use.		Update	MGM-MIRAGE	4-3.4.2		
GGS Requirement	160	A player will be able to exclude himself from making bets		Update	WW and MGM MIRAGE	4-3.5.1	Section 4.1 Self Exclusion Player Account Management Functional Specifications	



Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGs Requirement	161	In the event that a player excludes him or herself from a site on 3 separate occasions, MMOL will exclude the player permanently from the site		Update	WW and MGM MIRAGE	4-3.5.2	See Reports and Player Account Management Functional Specifications	
GGs Requirement	162	A player excluded from a site is entitled to be repaid his account balance, provided the system acknowledges that the funds have cleared		Update	WW and MGM MIRAGE	4-3.5.3	Player Account Management Functional Specifications	
GGs Requirement	163	Exclusion from the site will be permanent unless the operator and the player are able to confirm in writing that a player no longer has a problem. An admin screen will be made so that an admin user can take people off of the list of excluded players. There will also be a comment field so the operator can enter the reason for taking the account off the list of excluded players.		Update	WW and MGM MIRAGE	4-3.5.4	Orbis Administration Notes	
GGs Requirement	164	MMOL will be allowed to exclude a player and the commission can recommend exclusion		Update	WW and MGM MIRAGE	4-3.5.5	Orbis Administration Notes	
GGs Requirement	165	MMOL will maintain a register of reasons for exclusion		Update	WW and MGM MIRAGE	4-3.5.6	Orbis Administration Notes	
GGs Requirement	166	The system will be able to exclude players indefinitely by account or jurisdiction of residence, from being able to bet		Update	WW and MGM MIRAGE	4-3.5.7	Player Logon Functional Specifications and Verification Module Functional Specifications	
GGs Requirement	167	A person who is excluded from game play will not be able to re-register		Update	WW and MGM MIRAGE	4-3.5.8	Verification Module Functional Specifications and Registration Functional Specification	
IOM Regulation	168	The OGS must maintain information about all games played, including —the identity of the player	296-01(9)(a)	Update	WW and MGM MIRAGE	4-3.6.1i	Player Account Management Specifications	
IOM Regulation	169	The OGS must maintain information about all games played, including —the time the game began;	296-01(9)(b)	Update	WW and MGM MIRAGE	4-3.6.1ii	Player Account Management Specifications	
IOM Regulation	170	The OGS must maintain information about all games played, including —the balance on the player's account at the start of the game	296-01(9)(c)	Update	WW and MGM MIRAGE	4-3.6.1iii	Player Account Management Specifications	
IOM Regulation	171	The OGS must maintain information about all games played, including —the stakes placed in the game (timestamped);	296-01(9)(d)	Update	WW and MGM MIRAGE	4-3.6.1iv	Player Account Management Specifications	
IOM Regulation	172	The OGS must maintain information about all games played, including —the balance on the player's account at the end of the game	296-01(9)(e)	Update	WW and MGM MIRAGE	4-3.6.1x	Player Account Management Specifications	
IOM Regulation	173	The OGS must maintain information about all games played, including —the game status (in progress, complete, etc.);	296-01(9)(f)	Update	WW and MGM MIRAGE	4-3.6.1v	Player Account Management Specifications	
IOM Regulation	174	The OGS must maintain information about all games played, including —the result of the game (timestamped).	296-01(9)(g)	Update	WW and MGM MIRAGE	4-3.6.1vi	Player Account Management Specifications	
IOM Regulation	175	The OGS must maintain information about all games played, including —the time the game ended	296-01(9)(h)	Update	WW and MGM MIRAGE	4-3.6.1vii	Player Account Management Specifications	
IOM Regulation	176	The OGS must maintain information about all games played, including —amount won or lost by the player	296-01(9)(i)	Update	WW and MGM MIRAGE	4-3.6.1viii	Player Account Management Specifications	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	177	Adequate on-site transaction logging is to occur to ensure dispute resolution is transparent		Update	WW and MGM MIRAGE	4-3.6.2	WagerWorks Admin Configuration Functional Specifications and Verification Module Functional Specifications	
GGG Requirement	178	Adequate off site transaction logging and daily data back-ups are required to ensure recoverability		Update	MGM- MIRAGE	4-3.6.3		
GGG Requirement	179	Malfunction of the equipment will result in the voiding of the game bets and pays and the return of the affected bets		Update	WW and MGM MIRAGE	4-3.7.1	WagerWorks Admin Configuration Functional Specifications	Added a malfunction section that void bets and creates a record of the malfunctions. Specifically, all transactions that are affected of void and the money is returned to the state prior to the transaction.
IOM Regulation / GGG Requirement	180	"Malfunction Voids all pays and play" needs to be displayed in the rules for all the games.	296-01(1)(a)	Update	WW	4-3.7.2	MGM Ultimately decides what is on the Rules and Conditions but WW has the functionality for this information	
IOM Regulation	181	A player must be able to access online a statement of his account containing —sufficient information to allow him to reconcile the statement against his own records to the session level;	297-01(8)(a)	Update	WW and MGM MIRAGE	4-3.7.2.2	Player Account Management Documentation	
IOM Regulation	182	A player must be able to access online a statement of his account containing —details of major wins.	297-01(8)(b)	Update	WW and MGM MIRAGE	4-3.7.2.3	Player Account Management Documentation	
IOM Regulation / GGG Requirement	183	Account summary statements will be sent to the player via e-mail or land-mail upon request and on a regular basis	297-01(8)(a)	Update	WW and MGM MIRAGE	4-3.7.2.4	Player Account Management Documentation	A monthly e-mail will be sent to the player summarizing all account activity and gaming transactions. These will be organized be ascending time. On the casino side it will be broken down by game session including: start/end time, amount wagered, amount won/loss, game played. Orbis also needs to give us the info from the sportsbook.
IOM Regulation / GGG Requirement	184	Statements will highlight major wins and losses	297-01(8)(b)	Update	WW and MGM MIRAGE	4-3.7.2.6	Player Account Management Documentation	wins and losses over 100 ECU will be in bold.
GGG Requirement	185	MMOL will record all device malfunctions of the system with reason and corresponding solution/action.		Update	WW and MGM MIRAGE	4-3.7.3	WagerWorks Admin Configuration Functional Specifications and Game Platform Overview	
IOM Regulation / GGG Requirement	186	MMOL will be able to set limits on players and vary those limits from time to time. Players will be notified of these limits if imposed.	297-01(3)	Update	WW and MGM MIRAGE	4-3.8.1	WagerWorks Admin Configuration Functional Specifications	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
IOM Regulation / GGS Requirement	187	Bet limits - the player may set a max single bet	297-01(5.3.1)(a)	Update	WW and MGM MIRAGE	4-3.8.2	Player Account Management Functional Specifications	This Claim will be incorporated in Phase Two of the site development
IOM Regulation / GGS Requirement	188	Player can set Loss Limits from the original deposit over a particular time period. Player can set total wagered per month, week, day. If they are limited to the amount they can wager they can inherently only lose a certain amount.	297-01(5.3.1)(a,b,c)	Update	WW and MGM MIRAGE	4-3.8.3	Player Account Management Functional Specifications	
IOM Regulation / GGS Requirement	189	Player can set the limit for deposits over a period of time (not less than 7 days) - week, month and year	297-01(5.3.1)(a)	Update	WW and MGM MIRAGE	4-3.8.4	Player Account Management Functional Specifications	
IOM Regulation / GGS Requirement	190	Self Exclusion period of not less than 7 days	297-01(5.3.1)(a,b,c)	Update	WW and MGM MIRAGE	4-3.8.5	Section 4.1 Self Exclusion Player Account Management Functional Specifications	
IOM Regulation / GGS Requirement	191	MMOL will execute all limits set by the user	297-01(5.3.1)(a)	Update	WW and MGM MIRAGE	4-3.8.6	Player Account Management Functional Specifications	
GGS Requirement	192	Once established limits can only be increased by the player on 24 hours notice. Decreases are effective immediately.		Update	WW and MGM MIRAGE	4-3.8.7	Section 4.1 Self Exclusion Player Account Management Functional Specifications	
IOM Regulation / GGS Requirement	193	Determination of events of chance will not be influenced by anything other than a verified RNG	296-01(4)(5)	Update	WW and MGM MIRAGE	4-4.1.1	Section 8 Game Platform Overview	
GGS Requirement	194	The commission receives a certification letter from an accredited testing agency that approves all methods of RNG		Update	WW and MGM MIRAGE	4-4.1.10	Section 8 Game Platform Overview	
IOM Regulation	195	The OGS will faithfully follow the game rules published by MMOL	296-01(1)(a)	Update	WW and MGM MIRAGE	4-4.1.2	Game Platform Overview and Game Functional Specifications	
GGS Requirement	196	Outcomes from the RNG will be distributed within a statistically expected bounds including normal distribution		Update	WW and MGM MIRAGE	4-4.1.3	Section 8 Game Platform Overview	
GGS Requirement	197	Any mapping or scaling to convert random numbers into events will be linear and distributed		Update	WW and MGM MIRAGE	4-4.1.4	Section 11 XML Game Definition Description Game Platform Overview	
IOM Regulation / GGS Requirement	198	Events of chance will demonstrate that they are statistically random	296-01(3)(a)	Update	WW and MGM MIRAGE	4-4.1.5	Section 8 Game Platform Overview and PC sheets	
IOM Regulation / GGS Requirement	199	As events of chance occur they will be immediately used as directed by the rules of the game	296-01(1)(a)	Update	WW and MGM MIRAGE	4-4.1.6	Section 8 Game Platform Overview	
IOM Regulation / GGS Requirement	200	Where the rules of the game require a sequence or mapping of entities or events to be set up in advance, the entities or events will not be resequenced or remapped except as provided for in the rules of the game	296-01(1)(a)	Update	WW and MGM MIRAGE	4-4.1.7	Game Rules	
GGS Requirement	201	Except as provided by the rules of the game and for metamorphic games, events of chance within games will be independent of any other events within the game or any events within previous games		Update	WW and MGM MIRAGE	4-4.1.8	Player Account Management Functional Specifications	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
IOM Regulation / GGS Requirement	202	The RNG and its methodology will be based on a pseudo random number generating algorithm that is cryptographically strong or hardware based at the time of submission	296-01(3)(b)	Update	WW and MGM MIRAGE	4-4.1.9	Section 8 Game Platform Overview	
IOM Regulation / GGS Requirement	203	The RNG result will be proven to be statistically independent	296-01(3)(c )	Update	WW and MGM MIRAGE	4-4.2.1	Section 8 Game Platform Overview and XML Game Description Section 11 Game Platform Overview	
GGS Requirement	204	The system needs to deliver the most recent RNG result to the selected play		Update	WW and MGM MIRAGE	4-4.2.10	Game Platform Overview	
GGS Requirement	205	The method of seed set generation will be approved		Update	WW and MGM MIRAGE	4-4.2.11	Game Platform Overview	
GGS Requirement	206	The method of seed generation will make sure that the next number is not predictable		Update	WW and MGM MIRAGE	4-4.2.12	Game Platform Overview	
GGS Requirement	207	Seeding and reseeding will be kept to a minimum		Update	WW and MGM MIRAGE	4-4.2.13		
GGS Requirement	208	The range of values for the RNG will be adequate to provide sufficient precision and flexibility when setting outcome probabilities		Update	WW and MGM MIRAGE	4-4.2.14	Game Platform Overview	
GGS Requirement	209	If the random number with a range shorter than that provided by the RNG is required for some purpose by the game, the method of rescaling is to be designed such that all numbers within the lower range are equally probable		Update	WW and MGM MIRAGE	4-4.2.15	Section 8 Game Platform Overview	
GGS Requirement	210	The scaled sequence of numbers will pass the same statistical tests as applied to the sequence of numbers produced by the RNG		Update	WW and MGM MIRAGE	4-4.2.16	Game Platform Overview Section XML Game Definition, PC sheets	
GGS Requirement	211	The RNG and pseudo RNG used for result selection will meet the requirements of this section		Update	WW and MGM MIRAGE	4-4.2.17	Section 8 Game Platform Overview	
GGS Requirement	212	There will be some means that the verification can be made after the event that the results selected by the RNG computer system are the same as held in the gaming system		Update	WW and MGM MIRAGE	4-4.2.18	Game Platform Overview	
GGS Requirement	213	The RNG result will be proven to be uniformly distributed over a range		Update	WW and MGM MIRAGE	4-4.2.2	Section 8 Game Platform Overview, XML Game Description Section 11 Game Platform Overview and PC sheets	
GGS Requirement	214	The RNG result will be proven to pass various recognized statistical tests		Update	WW and MGM MIRAGE	4-4.2.3	Section 8 Game Platform Overview, PC sheets and Histogram Results	
GGS Requirement	215	The RNG results will be proven to be unpredictable without the knowledge of the algorithm, its implementation, and the current value of the seed.	296-01(3)(c )	Update	WW and MGM MIRAGE	4-4.2.4	Section 8 Game Platform Overview	
GGS Requirement	216	If players have individual RNGs for each session, the RNG will be cryptologically stronger than a single RNG used for all players		Update	WW and MGM MIRAGE	4-4.2.5		
GGS Requirement	217	The choice of the algorithm is in the discretion MMOL but will comply with this document		Update	MGM-MIRAGE	4-4.2.6		
GGS Requirement	218	The choice of the hardware is in the discretion of MMOL but will comply with this document		Update	MGM-MIRAGE	4-4.2.7		
GGS Requirement	219	If a hardware RNG is used there will be a failsafe mechanism to disable game play in the event that the device fails.		Update	WW and MGM MIRAGE	4-4.2.8	Section 8 Game Platform Overview	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGs Requirement	220	The RNG will be cycled continuously between games and during game play		Update	WW and MGM MIRAGE	4-4.2.9	Game Platform Overview	
IOM Regulation / GGS Requirement	221	Games will not be designed to give the player a false expectation of better odds by falsely representing any occurrence or event	296-01(1)(a) & 296-01(4)(5)	Update	WW and MGM MIRAGE	4-5.1.1	Game Functional Specifications	
GGs Requirement	222	A player who plays a game represented as being based on a random event will have an equally likely chance of obtaining any possible combination everytime a game is played.		Update	WW and MGM MIRAGE	4-5.1.10	Game Platform Overview	
GGs Requirement	223	The Player will not be forced to play a game just by selecting it	296-01(4)	Update	WW and MGM MIRAGE	4-5.1.11	Game Functional Specifications and Game Platform Overview	
IOM Regulation	224	Fairness and Information - The outcome of any game, and the return to the player, must be independent of the CPU, memory, disk or other components used in the computer or other device used by the player.	296-01(5)	Update	WW and MGM MIRAGE	4-5.1.12	Game Platform Overview	
IOM Regulation	225	Fairness and Information - The game outcome must not be affected by the effective bandwidth, link utilization, bit error rate or other characteristic of the communications channel between the OGS and the computer or other device used by the player.	296-01(6)(a).	Update	WW and MGM MIRAGE	4-5.1.13	Game Platform Overview	
IOM Regulation / GGS Requirement	226	Near-miss games will not be allowed	296-01(1)(a)	Update	MGM-MIRAGE	4-5.1.2		
IOM Regulation / GGS Requirement	227	Reel stop games where a reel stops at the predetermined symbol when the player selects it will not be allowed	296-01(1)(a)	Update	MGM-MIRAGE	4-5.1.3		
IOM Regulation / GGS Requirement	228	The rules will not be unfair or misleading	296-01(1)(a) & 296-01(6)(g)	Update	WW and MGM MIRAGE	4-5.1.4		
IOM Regulation / GGS Requirement	229	The approved rules for a game will be available online	296-01(1)(a) & 296-01(6)(g)	Update	WW and MGM MIRAGE	4-5.1.5		
IOM Regulation / GGS Requirement	230	The rules cannot be changed during a session unless effective notice is given to a player	296-01(1)(a) & 296-01(6)(g)	Update	WW and MGM MIRAGE	4-5.1.6		
GGs Requirement	231	Game rules cannot be changed between a player placing a bet and the decision and payment of winnings for the bet		Update	WW and MGM MIRAGE	4-5.1.7	WagerWorks Admin Configuration Functional Specification	
GGs Requirement	232	Each game will provide information in relation to its conduct		Update	WW and MGM MIRAGE	4-5.1.8		
GGs Requirement	233	In cases where the games are provided in different language versions, the game information will be the same across all language versions so that no one is advantaged or disadvantaged.		Update	WW and MGM MIRAGE	4-5.2.10	See Openbet Administration Notes, WagerWorks Admin Configuration Functional Specifications and Game Functional Specifications	
IOM Regulation	234	The OGS must be able to display for each game the following information (ie. on the current page or on a page directly accessible from the current page via a hyperlink) - the name of game	296-01(6)(b)	Update	WW and MGM MIRAGE	4-5.2.1i	Game Functional Specifications and Game Platform Overview	
IOM Regulation	235	The OGS must be able to display for each game the following information (ie. on the current page or on a page directly accessible from the current page via a hyperlink) - restrictions on play	296-01(6)(c)	Update	WW and MGM MIRAGE	4-5.2.1ii	Game Platform Overview	
IOM Regulation / GGS Requirement	236	The Game Name will be displayed on either the bet page or a readily accessible hotlink	296-01(6)(a).	Update	WW and MGM MIRAGE	4-5.2.2	Game Functional Specifications and Game Platform Overview	
GGs Requirement	237	Artwork requirements apply equally to artwork displayed in physical form and in virtual form		Update	WW and MGM MIRAGE	4-5.2.2.11	Game Functional Specifications	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
IOM Regulation / GGS Requirement	238	The artwork will either state the maximum bet, the number of credits that can be bet per selected lit line and the number of possible lines available or it will be possible to deduce this information from the game rules.	296-01(1)(a) & 297-01(5.3.1)(a)	Update	WW and MGM MIRAGE	4-5.2.2.12	MGM ultimately in charge of this but WW has some content page spec ideas	
IOM Regulation / GGS Requirement	239	The "Restrictions on play" will be displayed on either the bet page or a readily accessible hotlink	296-01(6)(b)	Update	WW and MGM MIRAGE	4-5.2.3		
IOM Regulation / GGS Requirement	240	Instructions on how to play including a pay table for all prizes and special features will be displayed on either the bet page or a readily accessible hotlink	296-01(6)(c)	Update	WW and MGM MIRAGE	4-5.2.4	See Rules and Conditions, Game Functional Specifications, and Game Configuration Specifications	
IOM Regulation / GGS Requirement	241	Current account balance displayed in currency (not CREDITS) will be displayed on either the bet page or a readily accessible hotlink	296-01(6)(d)	Update	WW and MGM MIRAGE	4-5.2.5	Page Specifications and Orbis Openbet Administration Notes	
IOM Regulation / GGS Requirement	242	Unit and total bet will be displayed	296-01(6)(e)	Update	WW and MGM MIRAGE	4-5.2.6	Page Specifications and Game Console Specifications	
GGS Requirement	243	For multi-player games, whether or not the outcome to a human player can be affected if another participating end player device is automated will be displayed on either the bet page or a readily accessible hotlink.		Update	WW and MGM MIRAGE	4-5.2.7		MMOL does not currently offer these types of games
GGS Requirement	244	In cases where games are provided in different language versions, each version will provide the same rates of return to the player		Update	WW and MGM MIRAGE	4-5.2.8	See Openbet Administration Notes, WagerWorks Admin Configuration Functional Specifications and Game Platform Overview	
GGS Requirement	245	In cases where games are provided in different language versions, each version will be consistent with the instructions of that version		Update	WW and MGM MIRAGE	4-5.2.9	See Openbet Administration Notes, WagerWorks Admin Configuration Functional Specifications and Game Functional Specifications	
GGS Requirement	246	Written messages shall be in English or such language developed by MMOL and be both grammatically and syntactically sound, in the languages used.		Update	WW and MGM MIRAGE	4-5.3.1.1		
GGS Requirement	247	Logos or copyright messages may be displayed.		Update	WW and MGM MIRAGE	4-5.3.1.10	See Game Functional Specifications	
GGS Requirement	248	Artwork graphics shall not be in any manner or form indecent or offensive.		Update	WW and MGM MIRAGE	4-5.3.1.11	See Game Functional Specifications	
GGS Requirement	249	For non-event based games, a pay scale on the artwork will correspond to the payscale used in the mathematical treatise.		Update	WW and MGM MIRAGE	4-5.3.1.12	Game Platform Overview	
GGS Requirement	250	The functions of all buttons represented on a screen will be clearly indicated, preferably on the button.		Update	WW and MGM MIRAGE	4-5.3.1.13	See Game Functional Specifications	
IOM Regulation / GGS Requirement	251	All game instructions on the artwork will be easily interpreted, not ambiguous, and sufficient to explain all game rules. Common sense rules apply.	296-01(1)(a) & 296-01(6)(g)	Update	WW and MGM MIRAGE	4-5.3.1.14	See Game Rules	
GGS Requirement	252	Game play and device usage instructions will be stated unambiguously and will not be misleading to the player.		Update	WW and MGM MIRAGE	4-5.3.1.2		
GGS Requirement	253	Game instructions and rules will be accessible and visible without the need for money to be bet on the game.		Update	WW and MGM MIRAGE	4-5.3.1.3	Game Functional Specifications	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGs Requirement	254	There will be sufficient game instructions to allow a player to determine the correctness of prizes awarded.		Update	WW and MGM MIRAGE	4-5.3.1.4	Game Functional Specifications	
GGs Requirement	255	If random prizes are offered the maximum value obtainable from the random prize will be indicated.		Update	WW and MGM MIRAGE	4-5.3.1.5	Game Functional Specifications	
GGs Requirement	256	If the value of the random prize depends on the amount of money wagered, this will be stated.		Update	WW and MGM MIRAGE	4-5.3.1.6	N/A	
GGs Requirement	257	All statements on the artwork will be true.		Update	WW and MGM MIRAGE	4-5.3.1.7	See Game Functional Specifications	
GGs Requirement	258	The game instructions shall be clearly visible or the means of displaying such instructions will be readily available at all times.		Update	WW and MGM MIRAGE	4-5.3.1.8	See Game Functional Specifications	
GGs Requirement	259	The name of the game being played will be clearly visible to the player.		Update	WW and MGM MIRAGE	4-5.3.1.9	See Game Functional Specifications	
GGs Requirement	260	Card faces are to clearly display the card value.		Update	WW and MGM MIRAGE	4-5.3.10.1	Game Functional Specifications	
GGs Requirement	261	Poker - artwork will provide clear indication if Stud Poker rules apply. Common draw poker is assumed if nothing is stated.		Update	WW and MGM MIRAGE	4-5.3.10.1i	Phantom Belle, Lucky Draw and Ten Play Game Functional Specifications	
GGs Requirement	262	Poker - the artwork will provide a definition of winning combinations outside the scope of standard Poker.		Update	WW and MGM MIRAGE	4-5.3.10.1ii	Phantom Belle, Lucky Draw and Ten Play Game Functional Specifications	
GGs Requirement	263	Poker - Wild card rules will be clearly explained		Update	WW and MGM MIRAGE	4-5.3.10.1iii	Phantom Belle, Lucky Draw and Ten Play Game Functional Specifications	
GGs Requirement	264	Poker - Held and non-held cards, including recommended holds (if implemented), in Draw Poker or the equivalent will be clearly marked on the Screen, and the method for changing Holds clearly displayed to the player.		Update	WW and MGM MIRAGE	4-5.3.10.1iv	Phantom Belle, Lucky Draw and Ten Play Game Functional Specifications	
GGs Requirement	265	Poker - Winning hands will be clearly labeled as to the win category.		Update	WW and MGM MIRAGE	4-5.3.10.1v	Phantom Belle, Lucky Draw and Ten Play Game Functional Specifications	
GGs Requirement	266	Poker - All special rules outside the scope of common Poker will be clearly explained.		Update	WW and MGM MIRAGE	4-5.3.10.1vi	Phantom Belle, Lucky Draw and Ten Play Game Functional Specifications	
GGs Requirement	267	Poker - When player options outside the scope of common Poker are currently available, they will be clearly explained on the artwork.		Update	WW and MGM MIRAGE	4-5.3.10.1vii	Phantom Belle, Lucky Draw and Ten Play Game Functional Specifications	
GGs Requirement	268	Card faces are to clearly indicate the suit.		Update	WW and MGM MIRAGE	4-5.3.10.2	Game Functional Specifications	
GGs Requirement	269	Blackjack - Insurance rules are to be clearly explained if Insurance is available.		Update	WW and MGM MIRAGE	4-5.3.10.2i	Top Hat Game Functional Specifications	
GGs Requirement	270	Blackjack - pair split rules will be explained.		Update	WW and MGM MIRAGE	4-5.3.10.2ii	Top Hat Game Functional Specifications	
GGs Requirement	271	Blackjack - Pair split rules such as split aces have only one card dealt to each ace, if this is the game rule will be explained.		Update	WW and MGM MIRAGE	4-5.3.10.2iii	Top Hat Game Functional Specifications	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	272	Blackjack - Pair split rules such as further splits, if available will be explained.		Update	WW and MGM MIRAGE	4-5.3.10.2iv	Top Hat Game Functional Specifications	
GGG Requirement	273	Blackjack - Any limits on the number of cards that may be drawn by player and/or Dealer are to be explained including winners declared (if any) when the limit is reached.		Update	WW and MGM MIRAGE	4-5.3.10.2ix	Top Hat Game Functional Specifications	
GGG Requirement	274	Blackjack - Pair splits rules such as double-down after splits, if available will be explained.		Update	WW and MGM MIRAGE	4-5.3.10.2v	Top Hat Game Functional Specifications	
GGG Requirement	275	Blackjack - Double-down rules are to be clearly explained including limitations of which totals may allow a double down to be selected.		Update	WW and MGM MIRAGE	4-5.3.10.2vi	Top Hat Game Functional Specifications	
GGG Requirement	276	Blackjack - The current total of all hands, including the dealer's total, will be displayed during and at the end of the game. The term "Bust" or the equivalent may be used to indicate a hand whose total has exceeded 21.		Update	WW and MGM MIRAGE	4-5.3.10.2vii	Top Hat Game Functional Specifications	
GGG Requirement	277	Blackjack - Dealer play rules will be clearly explained including special treatment of a soft 17 count, if any.		Update	WW and MGM MIRAGE	4-5.3.10.2viii	Top Hat Game Functional Specifications	
GGG Requirement	278	Blackjack - Surrender Rules are to be explained, if any exist.		Update	WW and MGM MIRAGE	4-5.3.10.2x	Top Hat Game Functional Specifications	
GGG Requirement	279	Blackjack - If the player loses on "Dealer Push" this is to be clearly explained.		Update	WW and MGM MIRAGE	4-5.3.10.2xi	Top Hat Game Functional Specifications	
GGG Requirement	280	Blackjack - London Deal rules are to be clearly explained if they exist.		Update	WW and MGM MIRAGE	4-5.3.10.2xii	Top Hat Game Functional Specifications	
GGG Requirement	281	Blackjack - Winning hands will be clearly labeled as to the win category.		Update	WW and MGM MIRAGE	4-5.3.10.2xiii	Top Hat Game Functional Specifications	
GGG Requirement	282	Blackjack - If Pair Splits have occurred, the results for each hand are to be shown.		Update	WW and MGM MIRAGE	4-5.3.10.2xiv	Top Hat Game Functional Specifications	
GGG Requirement	283	Blackjack - Special rules, if any, will be clearly explained.		Update	WW and MGM MIRAGE	4-5.3.10.2xv	Top Hat Game Functional Specifications	
GGG Requirement	284	Blackjack - All player options which are available at any point in time, are to be shown on the artwork.		Update	WW and MGM MIRAGE	4-5.3.10.2xvi	Top Hat Game Functional Specifications	
GGG Requirement	285	Jokers are to be distinguishable from all other cards.		Update	WW and MGM MIRAGE	4-5.3.10.3	Game Functional Specifications	
GGG Requirement	286	It will be clearly stated if more than one deck of cards is used in the game.		Update	WW and MGM MIRAGE	4-5.3.10.4	Game Functional Specifications	
IOM Regulation / GGG Requirement	287	The artwork will clearly state if the rules of the game do not shuffle the deck after every game. In this instance, the artwork will indicate when shuffles actually do occur.	296-01(1)(a)	Update	WW and MGM MIRAGE	4-5.3.10.5	Game Functional Specifications	
GGG Requirement	288	As a minimum the player will be able to view a tabulated display of the scorecard, which shows all winning hands and their payouts when no game is in progress.		Update	WW and MGM MIRAGE	4-5.3.10.6	Game Functional Specifications	
GGG Requirement	289	Gamble option - The gamble prize limit (if applicable) for a particular game and the maximum number of gambles available will be clearly stated. If wording indicating the maximum prize that can be won exists, then it will be possible to win this prize.		Update	WW and MGM MIRAGE	4-5.3.11.1	Game Functional Specifications	
GGG Requirement	290	Gamble Option - when the gamble option is exited automatically before reaching the maximum number of gambles available, the reason will be clearly displayed.		Update	WW and MGM MIRAGE	4-5.3.11.2	Game Functional Specifications	
GGG Requirement	291	Gamble Option - All references to gamble will use words, e.g. gamble or double-up which cannot be misinterpreted to indicate some other feature.		Update	WW and MGM MIRAGE	4-5.3.11.3	Game Functional Specifications	



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GGG Requirement	292	Gamble Option - Unusual conditions in which the gamble option cannot be accessed will be specified, i.e. those conditions not listed in the "Software" chapter.		Update	WW and MGM MIRAGE	4-5.3.11.4	Game Functional Specifications	
GGG Requirement	293	Gamble Option - If a gamble game offers a choice of multipliers, it will be clear to the player what are the range of choices/payouts.		Update	WW and MGM MIRAGE	4-5.3.11.5		
GGG Requirement	294	Gamble Option - Once the player has selected a multiplier, it will be clearly stated on the screen which multiplier was selected		Update	WW and MGM MIRAGE	4-5.3.11.6		
GGG Requirement	295	Multi-Operator Games will be considered on a case by case basis.		Update	WW and MGM MIRAGE	4-5.3.11.7		MMOL does not currently offer
GGG Requirement	296	Games not covered in these regulations will be considered on a case-by-case basis.		Update	WW and MGM MIRAGE	4-5.3.11.7	Game Functional Specifications	
GGG Requirement	297	General games - Initial player selection options are to be described.		Update	WW and MGM MIRAGE	4-5.3.12.1	Game Console Specifications and Game Functional Specifications	
GGG Requirement	298	Roulette - Each "Zero" used will be uniquely labeled.		Update	WW and MGM MIRAGE	4-5.3.12.1i	Roulette Game Functional Specifications	
GGG Requirement	299	Roulette - The simulated Roulette wheel will be in the identical format as a standard casino wheel with the exception that the position of "Zeroes" if more than one exist, in which case the "Zeroes" may be placed arbitrarily.		Update	WW and MGM MIRAGE	4-5.3.12.1ii	Roulette Game Functional Specifications	
GGG Requirement	300	Roulette - a scorecard or description of all available wagers and their payouts will be accessible by the player while not in game play.		Update	WW and MGM MIRAGE	4-5.3.12.1iii	Roulette Game Functional Specifications	
GGG Requirement	301	Roulette - The method of selecting individual wagers is to be explained by the artwork in the help desk section.		Update	WW and MGM MIRAGE	4-5.3.12.1iv	Roulette Game Functional Specifications	
GGG Requirement	302	Roulette - the wager(s) already selected by the Player are to be displayed on the screen.		Update	WW and MGM MIRAGE	4-5.3.12.1v	Roulette Game Functional Specifications	
GGG Requirement	303	Roulette - The simulated ball spin will result in a location that unambiguously determines the winning number.		Update	WW and MGM MIRAGE	4-5.3.12.1vi	Roulette Game Functional Specifications	
GGG Requirement	304	Player selection options once the game has commenced will be clearly shown on the screen.		Update	WW and MGM MIRAGE	4-5.3.12.2	Game Console Specifications and Game Functional Specifications	
GGG Requirement	305	Dice Games - Each face will clearly show the number of spots.		Update	WW and MGM MIRAGE	4-5.3.12.2i	Craps Functional Specification	
GGG Requirement	306	Dice Games - Simulated die will be of the same layout as standard die.		Update	WW and MGM MIRAGE	4-5.3.12.2ii	Craps Functional Specification	
GGG Requirement	307	Dice Games - It will be obvious which is the up face of each die after the dice are thrown.		Update	WW and MGM MIRAGE	4-5.3.12.2iii	Craps Functional Specification	
GGG Requirement	308	Dice Games - The result of each die will be clearly visible or displayed.		Update	WW and MGM MIRAGE	4-5.3.12.2iv	Craps Functional Specification	
GGG Requirement	309	Dice Games - There will be a description of each wagering option available on the artwork. For example, the craps wagers "Field" and "hardway" will be clearly explained.		Update	WW and MGM MIRAGE	4-5.3.12.2v	Craps Functional Specification	
GGG Requirement	310	Dice Games - All possible wagering options available and obtainable at any point in time will be displayed on the artwork.		Update	WW and MGM MIRAGE	4-5.3.12.2vi	Craps Functional Specification	
GGG Requirement	311	The winning amount for each separate wager and total winning amount are to be displayed on the screen.		Update	WW and MGM MIRAGE	4-5.3.12.3	Game Functional Specifications	

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GGG Requirement	312	Simulated racing games - All participants in the race will have characteristics that make it unique in appearance.		Update	WW and MGM MIRAGE	4-5.3.12.3i		
GGG Requirement	313	Simulated Racing Games - the result of the race will be clearly obvious and not open to misinterpretation.		Update	WW and MGM MIRAGE	4-5.3.12.3ii		
GGG Requirement	314	Simulated Racing Games - If prizes are to be paid for combinations involving runners other than just the first place finisher, the order of the place getters that can be involved with these prizes will be clearly shown on the screen.		Update	WW and MGM MIRAGE	4-5.3.12.3iii		
GGG Requirement	315	Simulated Racing Games - Each meaningful result position will be available for display in all last game replays.		Update	WW and MGM MIRAGE	4-5.3.12.3iv		
GGG Requirement	316	Simulated Racing Games - The rules for alternative wagering options and the expected payouts are to be clearly explained on the artwork.		Update	WW and MGM MIRAGE	4-5.3.12.3v		
GGG Requirement	317	Scratch Ticket - A precise definition of which player options will be taken to complete the game will be shown on the artwork.		Update	WW and MGM MIRAGE	4-5.3.12.4i		
GGG Requirement	318	Scratch Ticket - Details of how payouts are won and their amounts will be shown on the artwork.		Update	WW and MGM MIRAGE	4-5.3.12.4ii		
GGG Requirement	319	Scratch Ticket - All rules for symbols that may substitute in winning patterns will be displayed.		Update	WW and MGM MIRAGE	4-5.3.12.4iii		
IOM Regulation	320	The OGS must be able to display for each game the following information (ie. on the current page or on a page directly accessible from the current page via a hyperlink) - instructions on how to play, including a pay-table for all prizes and special features	296-01(6)(d)	Update	WW and MGM MIRAGE	4-5.2.1iii	Game Functional Specifications	
IOM Regulation	321	The OGS must be able to display for each game the following information (ie. on the current page or on a page directly accessible from the current page via a hyperlink) -the player's current account balance	296-01(6)(e)	Update	WW and MGM MIRAGE	4-5.2.1iv	Player Account Management Specifications	
IOM Regulation	322	The OGS must be able to display for each game the following information (ie. on the current page or on a page directly accessible from the current page via a hyperlink) - unit and total bets permitted	296-01(6)(f)	Update	WW and MGM MIRAGE	4-5.2.1v	Game Functional Specifications	
IOM Regulation	323	The OGS must be able to display for each game the following information -vi. The percentage return to the player, or sufficient information to enable a player to determine such	296-01(6)(g)	Update	WW and MGM MIRAGE	4-5.2.1vi	Game Functional Specifications and Game Platform Overview of RNG	
IOM Regulation	324	The OGS must be able to display for each game the following information (ie. on the current page or on a page directly accessible from the current page via a hyperlink) - the rules of the game		Update	WW and MGM MIRAGE	4-5.2.1vii	Player Account Management Specifications	
GGG Requirement	325	The bet denomination of the game will be clearly visible or able to be easily deduced.		Update	WW and MGM MIRAGE	4-5.3.2.1	Game Console Specifications	
GGG Requirement	326	If the game uses tokens, the number of credits registered for each monetary unit for the current game will be displayed.		Update	WW and MGM MIRAGE	4-5.3.2.2	Game Console Specifications	Only used for table games and roulette wheel
GGG Requirement	327	The minimum bet (if not easily deduced) will be readily available to the player.		Update	WW and MGM MIRAGE	4-5.3.2.4	Game Console Specifications	
GGG Requirement	328	The display of the result of a game outcome will not be misleading or deceptive to the player.		Update	WW and MGM MIRAGE	4-5.3.3.1	Game Functional Specifications	
GGG Requirement	329	The outcome of each game will be displayed for a reasonable length of time.		Update	WW and MGM MIRAGE	4-5.3.3.2	Game Functional Specifications	
GGG Requirement	330	The nature of all prizes will be clearly indicated.		Update	WW and MGM MIRAGE	4-5.3.3.3	Game Functional Specifications	
GGG Requirement	331	If the artwork contains game instructions specifying a maximum win then it will be possible to win this amount from a single game.		Update	WW and MGM MIRAGE	4-5.3.3.4	PC Sheets and Game Functional Specifications	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	332	To the extent that is practicable for the range of games offered, only one method of displaying win amounts may be used on an e-gambling site so as to avoid confusion.		Update	WW and MGM MIRAGE	4-5.3.3.5	Game Functional Specifications	
GGG Requirement	333	The prizes for the winning patterns of each symbol will be placed in an area that visually belongs to the symbol. Appropriate boxing or framing will be adequate.		Update	WW and MGM MIRAGE	4-5.3.4.1	Game Functional Specifications	
GGG Requirement	334	The scattered symbols will be clearly labeled with the word "scatters" once in the game instructions. Further scattered symbols are not required.		Update	WW and MGM MIRAGE	4-5.3.4.10	Game Functional Specifications	
GGG Requirement	335	The number of symbols required to appear in the reels display window, in order to trigger each prize, will be indicated. # will line up with prizes to avoid ambiguity.		Update	WW and MGM MIRAGE	4-5.3.4.2	Game Functional Specifications	
GGG Requirement	336	If some symbols share the same pay scale then they will be placed in an area that visually belongs to that pay scale.		Update	WW and MGM MIRAGE	4-5.3.4.3	Game Functional Specifications	
GGG Requirement	337	If prizes can be awarded for mixed or grouped symbols, the artwork will clearly specify the grouping of the symbols either by placing the symbols in an area that clearly belongs to the pay scale and labeled with the term Mixed or by using a descriptive term that clearly defines the grouping.		Update	WW and MGM MIRAGE	4-5.3.4.4	PC Sheets and Game Functional Specifications	
GGG Requirement	338	If the prizes for multiple credits staked are tabulated then the number of credits bet required for each prize will be placed in a location that clearly indicates which prizes apply to which multipliers.		Update	WW and MGM MIRAGE	4-5.3.4.5	Game Functional Specifications	
GGG Requirement	339	If partial tabulation exists, the artwork will clearly indicate that the prize for one credit is multiplied by the number of credits bet.		Update	WW and MGM MIRAGE	4-5.3.4.6	Game Functional Specifications	
GGG Requirement	340	Where both multiplier instructions and tabulated prizes are displayed on artwork, there will be no confusion possible as to whether the multiplier applies to the tabulated prizes or not.		Update	WW and MGM MIRAGE	4-5.3.4.7	Game Functional Specifications	
GGG Requirement	341	In games that permit multiple credits to be wagered on selected lit lines, the artwork will either clearly state the win(s) for each selected lit line will be multiplied by the number of credits wagered on that line or show a tabulation of all possible wagers and their payouts.		Update	WW and MGM MIRAGE	4-5.3.4.8	Game Functional Specifications	
GGG Requirement	342	The artwork will clearly indicate that scattered pays are multiplied by the total number of credits staked. This may be either via a message or a tabulation of all possible wagers and their payouts. Alternate game instructions will ensure that it is not possible to incorrectly assume that the tabulated prizes are further multiplied by credit bets.		Update	WW and MGM MIRAGE	4-5.3.4.9	Game Functional Specifications	
GGG Requirement	343	Game instructions that belong to only one symbol/prize or a group of symbols/prizes will be clearly associated with the symbol/prize or group of symbols/prizes. Appropriate framing and boxing is adequate.		Update	WW and MGM MIRAGE	4-5.3.5.1	Game Functional Specifications	
GGG Requirement	344	Game instructions that refer to all symbols/prizes will read "ALL" or equivalent. If some symbols/prizes are excluded from these instructions, this will be indicated with wording such as "EXCEPT" or equivalent.		Update	WW and MGM MIRAGE	4-5.3.5.2	Game Functional Specifications	
GGG Requirement	345	Game instructions will be printed in a color that contrasts with the background color to ensure that all instructions are clearly readable.		Update	WW and MGM MIRAGE	4-5.3.5.3	Game Functional Specifications	
GGG Requirement	346	Symbols that are not characters or numbers will maintain the same shape throughout all artwork, except while animation is in progress. Any symbol that changes shape or color during an animation process will not appear in a way that might misrepresent another symbol in the payable.		Update	WW and MGM MIRAGE	4-5.3.5.4	Game Functional Specifications	
GGG Requirement	347	If game instructions refer to a particular symbol and the written name for the symbol may be mistaken for another symbol then the visual display of the instructions will clearly indicate to which symbol the instruction is referred		Update	WW and MGM MIRAGE	4-5.3.5.5	Game Functional Specifications	
GGG Requirement	348	In order for the artwork to clearly state which symbols may act as a substitute for other symbols and any conditions that may apply an indication that the substitute(s) match "ALL" symbols will be displayed.		Update	WW and MGM MIRAGE	4-5.3.6.1	Game Functional Specifications	
GGG Requirement	349	The artwork will clearly state if the game provides for a change of substitutes, and any special conditions that may apply.		Update	WW and MGM MIRAGE	4-5.3.6.10		
GGG Requirement	350	If the game provides for extra pays, or multipliers apply when substitutes participate in winning patterns, a clear explanation will be provided.		Update	WW and MGM MIRAGE	4-5.3.6.11		

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	351	If the game provides for multipliers to apply when substitutes participate in winning patterns, the multiplication factor or a tabulation of all prizes with possible multipliers will be displayed.		Update	WW and MGM MIRAGE	4-5.3.6.12		
GGG Requirement	352	If extra pays or multipliers apply when substitutes participate in winning patterns, the handling of winning patterns where multiple substitutes participate is to be clearly explained.		Update	WW and MGM MIRAGE	4-5.3.6.13		
GGG Requirement	353	Substitute symbols may be used as long as a list is provided of the symbols that the substitute does match.		Update	WW and MGM MIRAGE	4-5.3.6.2	Game Functional Specifications	
GGG Requirement	354	Substitute symbols may be used as long as a list is provided using the term "EXCEPT" which the substitute does not match OR provide a statement clearly describing groups of symbols which are substituted.		Update	WW and MGM MIRAGE	4-5.3.6.3	Game Functional Specifications	
GGG Requirement	355	With the exception of Scatters, where a game's rules allow both substitute symbols to win a prize and concurrently substitute for some other symbol, explanations of this rule will be explicitly included. Example Sub Sub Sub Queen Queen pay both 3 Subs and 5 Queens.		Update	WW and MGM MIRAGE	4-5.3.6.4		
GGG Requirement	356	Where multiple patterns that use substitutes exist on the selected lit line and the game only pays one of these combinations, explanations of this rule will be explicitly included. It is not required to state the reverse case where only one prize is paid.		Update	WW and MGM MIRAGE	4-5.3.6.5		
GGG Requirement	357	Substitution occurs for patterns where none of the substituted symbols are displayed. Explanation of this rule will be explicitly included. It is not required to state the reverse case where only one prize is paid.		Update	WW and MGM MIRAGE	4-5.3.6.6		
GGG Requirement	358	The artwork will state all rules relative to Substitutes participating in scattered wins such as, if applicable, the artwork will specifically state when the term "substitutes for all symbols" is used but the Substitute does not participate in scattered wins.		Update	WW and MGM MIRAGE	4-5.3.6.7		
GGG Requirement	359	The artwork will state all rules relative to Substitutes participating in scattered wins, for example, the artwork will state payout rules for coinciding wins when there are multiple scattered wins symbols and substitutes participate, including the situation where one or more scattered symbols may not appear.		Update	WW and MGM MIRAGE	4-5.3.6.8		
GGG Requirement	360	If there is a feature where a symbol may substitute in a winning pattern when the symbol is not on a payline, this will be clearly specified on the artwork.		Update	WW and MGM MIRAGE	4-5.3.6.9		
GGG Requirement	361	All winning patterns relevant to the particular point in time of a game, will be clearly displayed or accessible on some form of artwork. All undefined patterns are assumed to be non-winning.		Update	WW and MGM MIRAGE	4-5.3.7.1	Game Functional Specifications	
GGG Requirement	362	Complicated winning patterns will be clearly explained.		Update	WW and MGM MIRAGE	4-5.3.7.2	Game Functional Specifications	
GGG Requirement	363	The winning pattern for scatters will be explicitly stated or displayed.		Update	WW and MGM MIRAGE	4-5.3.7.3	Game Functional Specifications	
GGG Requirement	364	If generic winning patterns are only represented graphically then they will be supplemented with numbers to indicate how many correct symbols each pattern corresponds to: except for unusual winning patterns where numbers will not be displayed and the pattern will be positioned in proximity to the prize.		Update	WW and MGM MIRAGE	4-5.3.7.4	Game Functional Specifications	
GGG Requirement	365	Winning patterns that are not "left to right" or "right to left" or "any" will be clearly explained preferably with pictorial representations.		Update	WW and MGM MIRAGE	4-5.3.7.5	Game Functional Specifications	
GGG Requirement	366	The artwork will appropriately state that all wins occur on selected lines or equivalent.		Update	WW and MGM MIRAGE	4-5.3.7.6	Game Functional Specifications	
GGG Requirement	367	If it is possible to bet on multiple possible lines and it is not clearly obvious which reel positions are part of each of the possible lines, then the additional lines will be clearly displayed on the artwork and appropriately labeled.		Update	WW and MGM MIRAGE	4-5.3.7.7	Game Functional Specifications	
GGG Requirement	368	The trigger pattern(s) and all other conditions that will occur, in order to trigger the feature, will be unambiguously specified.		Update	WW and MGM MIRAGE	4-5.3.8.1	Game Functional Specifications	
IOM Regulation / GGG Requirement	369	In situations of free games the appropriate game instructions defining the number of possible lines and credits per line that are wagered during the free games will be clearly displayed.	297-01(2.2)(a)	Update	WW and MGM MIRAGE	4-5.3.8.10	Free play Functional Specifications	
GGG Requirement	370	For games where one or more reels are automatically "held" for one or more "re-spins" the rules and criteria for the re-spin and which reel positions are held will be clear and without possible misinterpretation.		Update	WW and MGM MIRAGE	4-5.3.8.11		MMOL does not currently offer this type of game

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GGG Requirement	371	Reel positions such as which reels are to be held will be clearly stated or shown.		Update	WW and MGM MIRAGE	4-5.3.8.12	Game Functional Specifications and PC sheets	MMOL does not currently offer this type of game
GGG Requirement	372	For games where reels may be held a description of whether held reels occur on winning or non-winning patterns will be clearly stated.		Update	WW and MGM MIRAGE	4-5.3.8.13	Game Functional Specifications and PC sheets	MMOL does not currently offer this type of game
GGG Requirement	373	For games where reels may be held for re-spins a specific line will be shown where the trigger combination will occur if any or scattered if that is the actual requirement of the game.		Update	WW and MGM MIRAGE	4-5.3.8.14		MMOL does not currently offer this type of game
GGG Requirement	374	If a partial number of reels are held for some criteria, it will be clearly stated what happens when the criteria forms part of a larger pattern.		Update	WW and MGM MIRAGE	4-5.3.8.15		MMOL does not currently offer this type of game
GGG Requirement	375	For games where reels may be held if the trigger is a winning pattern and the pattern does not pay during re-spins, this will be clearly stated on the artwork.		Update	WW and MGM MIRAGE	4-5.3.8.16		MMOL does not currently offer this type of game
GGG Requirement	376	The rules for extensions or termination of the re-spin sequences including additional held reels, when there are improvements to the original held combination(s), are to be clearly explained in the artwork.		Update	WW and MGM MIRAGE	4-5.3.8.17		MMOL does not currently offer this type of game
GGG Requirement	377	If more than one re-spin is offered, the number of re-spins that have occurred or the number remaining (or the total number) will be displayed.		Update	WW and MGM MIRAGE	4-5.3.8.18		MMOL does not currently offer this type of game
GGG Requirement	378	For games where one or more bonus prizes may be paid to the player during the feature sequence, which generally is awarded as a result of some second (or subsequent) screen animation, the criteria for entry to such a further bonus feature as well as the initial entry are to be clearly stated.		Update	WW and MGM MIRAGE	4-5.3.8.19	Game Functional Specifications	
GGG Requirement	379	The action of the game when feature trigger patterns occur during the feature is to be clearly stated on the artwork.		Update	WW and MGM MIRAGE	4-5.3.8.2	Game Functional Specifications	
GGG Requirement	380	For games where one or more bonus prizes may be paid to the player during the feature sequence, all instructions and player choices for the bonus feature are to be clearly stated.		Update	WW and MGM MIRAGE	4-5.3.8.20	Game Functional Specifications	
GGG Requirement	381	For games where one or more bonus prizes may be paid to the player during the feature sequence, a display of total amounts won will be available at the end of each stage of the game including on second screen animations. This is to include a display of bonus prizes won to date in multiple sequence bonus features		Update	WW and MGM MIRAGE	4-5.3.8.21	Game Functional Specifications	
GGG Requirement	382	If bonus prizes are multiplied the artwork will clearly state whether they are multiplied by credits staked per line or total where appropriate.		Update	WW and MGM MIRAGE	4-5.3.8.22	Game Functional Specifications	
GGG Requirement	383	For metamorphic games where the player still pays for the sequence games, all instructions for the game including the differences between the main game and the metamorphic game are to be stated.		Update	WW and MGM MIRAGE	4-5.3.8.23	Game Functional Specifications	Metamorphic means a game entered into from another game (where generally a higher RTP exists or an accumulated bonus prize results), which the player will risk money on in order to play.
GGG Requirement	384	For metamorphic games where the player still pays for the sequence games, an indication will be stated that the number of lines and/or number of credits wagered during the metamorphic sequence may not exceed the wager of the game or games which triggered the feature if that is the rule of the feature.		Update	WW and MGM MIRAGE	4-5.3.8.24	Game Functional Specifications	Metamorphic means a game entered into from another game (where generally a higher RTP exists or an accumulated bonus prize results), which the player will risk money on in order to play.
GGG Requirement	385	Any special prizes, substitutes, multipliers or similar rules during the metamorphic sequence will be clearly stated on the artwork.		Update	WW and MGM MIRAGE	4-5.3.8.25	Game Functional Specifications	All special prizes are in the help section of the game
GGG Requirement	386	If the metaphoric sequence consist of more than one feature game, the number of games in the metamorphic sequence that has occurred or the number remaining (or the total number) will be displayed.		Update	WW and MGM MIRAGE	4-5.3.8.26		

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	387	In spin reel variations the held and non-held reels, including recommended reels, may be clearly marked on the screen at all times.		Update	WW and MGM MIRAGE	4-5.3.8.27	Game Functional Specifications	
GGG Requirement	388	In spin reel variations the method for changing holds will be clearly displayed to the player.		Update	WW and MGM MIRAGE	4-5.3.8.28	Game Functional Specifications	
GGG Requirement	389	In spin reel variations if the player will wager additional credits to participate in the hold reels phase of the game this will be stated.		Update	WW and MGM MIRAGE	4-5.3.8.29		
GGG Requirement	390	In spin reel variations a display that the player is able to hold or release reels will be shown.		Update	WW and MGM MIRAGE	4-5.3.8.30	Game Functional Specifications	
GGG Requirement	391	If a symbol that can form part of a winning combination is not on all reels, the artwork will clearly show which reels the symbol appears on.		Update	WW and MGM MIRAGE	4-5.3.8.31	Game Functional Specifications	
GGG Requirement	392	For games with rules that allow for the accumulation of tokens to qualify for a feature or multiple features to be triggered the definition of the event that leads to the accumulation of tokens will be clearly shown.		Update	WW and MGM MIRAGE	4-5.3.8.3i		
GGG Requirement	393	For games with rules that allow for the accumulation of tokens to qualify for a feature or multiple features to be triggered a description of how many tokens are accumulated with each occurrence of the event will be clearly shown.		Update	WW and MGM MIRAGE	4-5.3.8.3ii		
GGG Requirement	394	For games with rules that allow for the accumulation of tokens to qualify for a feature or multiple features to be triggered, a description of how many tokens are required to trigger the feature will be clearly shown.		Update	WW and MGM MIRAGE	4-5.3.8.3iii		
GGG Requirement	395	For games with rules that allow for the accumulation of tokens to qualify for a feature or multiple features to be triggered an indication of how many tokens are currently accumulated will be clearly shown.		Update	WW and MGM MIRAGE	4-5.3.8.3iv		
GGG Requirement	396	For games with rules that allow for the accumulation of tokens (or sub-tokens that accumulate to tokens) to qualify for a feature or multiple features to be triggered a description of the number of sub-tokens needed to accumulate a token and the number of sub-tokens and tokens currently accumulated will be clearly shown.		Update	WW and MGM MIRAGE	4-5.3.8.3v		
GGG Requirement	397	For games with rules that allow for the accumulation of tokens to qualify for a feature or multiple features to be triggered if the accumulation of tokens may lead to free games, the number of possible lines and credits per line that are to be wagered during the free games will be clearly shown.		Update	WW and MGM MIRAGE	4-5.3.8.3vi		
GGG Requirement	398	For games with rules that allow for the accumulation of tokens to qualify for a feature or multiple features to be triggered will clearly state cases where further tokens are not accumulated during the feature sequence for events which normally would qualify to earn tokens will be clearly shown.		Update	WW and MGM MIRAGE	4-5.3.8.3vii		
IOM Regulation	399	A person need not be registered for online gambling consisting of a game where — no stake or bet is made in money or money's worth, and	297-01(2.2)(a)			4-5.3.8.4	Game Functional Specifications	
IOM Regulation	400	A person need not be registered for online gambling consisting of a game where — nothing in money or money's worth may be won or lost	297-01(2.2)(b)			4-5.3.8.5	Game Functional Specifications	
IOM Regulation / GGS Requirement	401	In situations of free games additional payouts for non-winners during the free game sequences, if any, are to be displayed on the artwork. In addition, a clear indication if this payout is to be multiplied by credits staked per line or total credits staked is to be given.	297-01(2.2)(a)	Update	WW and MGM MIRAGE	4-5.3.8.6	Free play Functional Specifications	
IOM Regulation / GGS Requirement	402	In situations of free games any multipliers for prizes, special prizes, substitutes and other special rules are to be displayed on the artwork.	297-01(2.2)(a)	Update	WW and MGM MIRAGE	4-5.3.8.7	Free play Functional Specifications	
IOM Regulation / GGS Requirement	403	In situations of free games a clear display of an accumulated win amount is required during each stage of the free games if the gaming machine does not directly add wins to the credit meter.	297-01(2.2)(a)	Update	WW and MGM MIRAGE	4-5.3.8.8	Free play Functional Specifications	
IOM Regulation / GGS Requirement	404	In situations of free games if more than one free game is offered, the number of free games that have occurred or the number remaining (or the total number) will be displayed.	297-01(2.2)(a)	Update	WW and MGM MIRAGE	4-5.3.8.9	Free play Functional Specifications	
GGG Requirement	405	In games like Keno or Bingo where balls are drawn from a simulated cage or the equivalent and a player tries to pick in advance which of these balls are selected, the player will be able to view or access a tabulated display of the scorecard, which shows all winning payouts when no game is in progress		Update	WW and MGM MIRAGE	4-5.3.9.1i	Keno and Bingo Functional Specifications	
GGG Requirement	406	In games like Keno or Bingo where balls are drawn from a simulated cage or the equivalent and a player tries to pick in advance which of these balls are selected, any special rules, which are outside the standard game of Keno, will be clearly explained.		Update	WW and MGM MIRAGE	4-5.3.9.1ii	Keno and Bingo Functional Specifications	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	407	In games like Keno or Bingo where balls are drawn from a simulated cage or the equivalent and a player tries to pick in advance which of these balls are selected, all of the player's selections will be clearly identified on the screen.		Update	WW and MGM MIRAGE	4-5.3.9.1iii	Keno and Bingo Functional Specifications	
GGG Requirement	408	In games like Keno or Bingo where balls are drawn from a simulated cage or the equivalent and a player tries to pick in advance which of these balls are selected, the balls drawn will be clearly identified on the screen.		Update	WW and MGM MIRAGE	4-5.3.9.1iv	Keno and Bingo Functional Specifications	
GGG Requirement	409	In games like Keno or Bingo where balls are drawn from a simulated cage or the equivalent and a player tries to pick in advance which of these balls are selected, the game will highlight balls drawn which match the player's selections.		Update	WW and MGM MIRAGE	4-5.3.9.1v	Keno and Bingo Functional Specifications	
GGG Requirement	410	In games like Keno or Bingo where balls are drawn from a simulated cage or the equivalent and a player tries to pick in advance which of these balls are selected, special hits, if any, are to be clearly identified.		Update	WW and MGM MIRAGE	4-5.3.9.1vi	Keno and Bingo Functional Specifications	
GGG Requirement	411	In games like Keno or Bingo where balls are drawn from a simulated cage or the equivalent and a player tries to pick in advance which of these balls are selected, the screen will provide clear indication of how many spots were selected and how many hits.		Update	WW and MGM MIRAGE	4-5.3.9.1vii	Keno and Bingo Functional Specifications	
GGG Requirement	412	In games like Keno or Bingo where balls are drawn from a simulated cage or the equivalent and a player tries to pick in advance which of these balls are selected, rules for purchase of additional features of the game, if any, are to be explained.		Update	WW and MGM MIRAGE	4-5.3.9.1viii	Keno and Bingo Functional Specifications	
GGG Requirement	413	In games like Keno or Bingo where balls are drawn from a simulated cage or the equivalent and a player tries to pick in advance which of these balls are selected, the artwork will clearly state how the player makes or changes selections, specifically, how individual numbers are picked, how individual numbers are cleared, and how all selections are cleared.		Update	WW and MGM MIRAGE	4-5.3.9.ix	Keno and Bingo Functional Specifications	The game itself has a simple mechanism that allows a player to select and unselect numbers
GGG Requirement	414	Game Design - All critical functions including the generation of the result of any game (and the return to the player) will be generated by the IGS and independent of the end player device. Exemption to this requirement will be considered in implementations where game result determination involving participation of both ends is completely secure and manipulation on the end device cannot interfere with the game integrity.		Update	WW and MGM MIRAGE	4-5.4.1	Game Platform Overview	
GGG Requirement	415	Simulation of a physical device - the visual representation of the device will correspond to the features of the physical device.		Update	WW and MGM MIRAGE	4-5.4.10	Game Platform Overview and Game Functional Specifications	
GGG Requirement	416	Simulation of a physical device - The probability of any event occurring will be as for the actual physical device.		Update	WW and MGM MIRAGE	4-5.4.11	Game Platform Overview and Game Functional Specifications	
GGG Requirement	417	Simulation of a physical device - Where the game simulates multiple physical devices that would be expected to be independent of one another, each simulated device will be independent of the other simulated devices.		Update	WW and MGM MIRAGE	4-5.4.12		MMOL does not currently offer
GGG Requirement	418	Simulation of a physical device - Where the game simulates physical devices that have no memory of previous events, the behavior of the simulations will be independent of their previous behavior so as to be non-adaptive and unpredictable in practice.		Update	WW and MGM MIRAGE	4-5.4.13	Game Platform Overview and Game Functional Specifications	MMOL does not currently offer
GGG Requirement	419	Games that are not completely independent of player's history will display clearly to the player which game rules apply to the current game state.		Update	WW and MGM MIRAGE	4-5.4.14		MMOL does not currently offer
GGG Requirement	420	Games that are not completely independent of player's history will display to the player sufficient information to indicate the current status towards the triggering of the next metamorphosis of the game.		Update	WW and MGM MIRAGE	4-5.4.15		MMOL does not currently offer
GGG Requirement	421	Games that are not completely independent of player's history will not adjust the likelihood of a metamorphosis occurring based on the history of prizes obtained in previous games.		Update	WW and MGM MIRAGE	4-5.4.16		MMOL does not currently offer
GGG Requirement	422	Games that are not completely independent of player's history will not be misleading.		Update	WW and MGM MIRAGE	4-5.4.17		MMOL does not currently offer
GGG Requirement	423	Game Design - Game outcome will not be affected by the effective bandwidth, link utilization, bit error rate or other characteristic of the communications channel between the IGS and the end player device.		Update	WW and MGM MIRAGE	4-5.4.2	Game Platform Overview	
GGG Requirement	424	Game design - a game will not be approved unless MMOL & the Commission is satisfied that the game is not designed to give the player a false expectation.	296-01-1a,b & 6g	Update	WW and MGM MIRAGE	4-5.4.3	Game Functional Specifications	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	425	Game design - a game will not be approved unless MMOL & the Commission is satisfied that the rules of the game are not unfair or misleading.	296-01-1a,b & 6g	Update	WW and MGM MIRAGE	4-5.4.4	Game Functional Specifications	
GGG Requirement	426	Game design - a game will not be approved unless MMOL & the Commission is satisfied that the rules of the game are available to the player and the game operates and interacts with the player strictly in accordance with the rules.	296-01(1)(a,b) & (6)(g)	Update	WW and MGM MIRAGE	4-5.4.5	Game Functional Specifications	
GGG Requirement	427	Game design - a game will not be approved unless MMOL & the Commission is satisfied that the game has a statistical return to the player of at least an advertised minimum.	296-01(1)(a,b) & (6)(g)	Update	WW and MGM MIRAGE	4-5.4.6	Histogram Results and PC sheets	
GGG Requirement	428	Player return for a game will be demonstrable as well as theoretical and will be of a similar return to those games typically found in land-based gambling venues/sites.		Update	WW and MGM MIRAGE	4-5.4.7	PC sheets	
GGG Requirement	429	For games with a component of skill, the calculated player return will represent a reasonably achievable strategy from an average player.		Update	WW and MGM MIRAGE	4-5.4.8	Histogram Results and PC sheets	
GGG Requirement	430	Where a game is represented or implied to be a simulation of a physical device, the behavior of the simulation will be identical to the expected behavior of the physical device.		Update	WW and MGM MIRAGE	4-5.4.9	Game Platform Overview and Game Functional Specifications	
GGG Requirement	431	In the event that a game cannot be continued due to an IGS action, all bets will be returned to the players of that game.		Update	WW and MGM MIRAGE	4-5.5.1	Game Platform Overview and WagerWorks Admin Configuration Functional Specifications	
GGG Requirement	432	If an immediate termination feature is used if a player has a winning streak that is later proven to be attributable to chance and not malfunction or foul-play MMOL may be fully liable for any payout or consequential damage.		Update	WW and MGM MIRAGE	4-5.5.10	Wagerworks Admin Configuration Functional Specification	
GGG Requirement	433	If a valid multi-state game is terminated the player will be advised that this has occurred the next time they log on the system		Update	WW and MGM MIRAGE	4-5.5.11	Wagerworks Admin Configuration Functional Specification	
GGG Requirement	434	If the IGS extends an invitation to play a particular game, it will accept all legitimate wagers for that game.		Update	WW and MGM MIRAGE	4-5.5.2	Game Platform Overview	
GGG Requirement	435	The methodology employed by a player to select and play a particular game will be unambiguous.		Update	WW and MGM MIRAGE	4-5.5.3	Game Functional Specifications	
GGG Requirement	436	The player will at all times be made aware of which game has been selected for play or is being played.		Update	WW and MGM MIRAGE	4-5.5.4	Game Functional Specifications	
GGG Requirement	437	The player will not be forced to play a game just by selecting it		Update	WW and MGM MIRAGE	4-5.5.5	Game Functional Specifications	The player will at all times know he is playing a specific game since the name will appear somewhere in the artwork on the screen.
GGG Requirement	438	It will not be possible to start a new game before the current play is completed and all relevant meters have been updated on the IGS and session balance, or if applicable, player's total funds balance, has been updated. Some exceptions may be granted in instances where for example MMOL elects to conduct off-line, manual consideration of large payouts (that is, if a player chooses to continue gaming while a large payout is pending then this will be permitted).		Update	WW and MGM MIRAGE	4-5.5.6	Game Platform Overview	
GGG Requirement	439	The IGS will provide a mechanism for a game to be disabled by MMOL.		Update	WW and MGM MIRAGE	4-5.5.7	Wagerworks Admin Configuration Functional Specification	
GGG Requirement	440	When a game is disabled, the game is not to be accessible to a player once the player's game has concluded.		Update	WW and MGM MIRAGE	4-5.5.8	Game Platform Overview and WagerWorks Admin Configuration Functional Specifications	



Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	441	Terminating a game that is in play is a serious matter and so full audit trails will be provided on the use of this function. It is only to be used where there is known and demonstrable system problems.		Update	WW and MGM MIRAGE	4-5.5.9	Wagerworks Admin Configuration Functional Specification	
GGG Requirement	442	The IGS will provide a mechanism for a player to complete an incomplete game before a player is permitted to participate in any other game.		Update	WW and MGM MIRAGE	4-5.6.1	Game Platform Overview	
GGG Requirement	443	Definition of incomplete games include, loss of communications between IGS and end player device, IGS restart, disabled by IGS, end player device restart and abnormal termination of gambling application on end player device.		Update	WW and MGM MIRAGE	4-5.7.1	Game Platform Overview	
GGG Requirement	444	Incomplete games - upon reconnection by the player, the IGS is to present the player the incomplete game for completion.		Update	WW and MGM MIRAGE	4-5.7.2	Game Platform Overview	
GGG Requirement	445	Incomplete games - Multistage games that have been disabled by the IGS are to be terminated upon the disable of the game.		Update	WW and MGM MIRAGE	4-5.7.3	Game Platform Overview	
GGG Requirement	446	Incomplete games - Bets associated with a partially complete game that can be continued will be held in a separate account until the game completes. Player accounts will reflect any funds held in the incomplete game account.		Update	WW and MGM MIRAGE	4-5.7.4	Game Platform Overview	
GGG Requirement	447	Multi-Player games with outcomes that can be affected through an external exchange of information between different players will not be permitted unless clear rules, compensating controls or technology is put in place to assure the Commission that the prospect of cheating is addressed and is eliminated.		Update	WW and MGM MIRAGE	4-5.8.1		MMOL does not currently offer
GGG Requirement	448	Multi-Player games with outcomes that can be affected through the use of automated end player devices or ancillary computer systems will have prominent warnings so that human players can make an informed decision whether or not to participate.		Update	WW and MGM MIRAGE	4-5.8.2		MMOL does not currently offer
GGG Requirement	449	The IGS will constantly monitor the effective response time of all end player devices participating in a particular instance of a multiplayer game and adjust response times to individual end player devices to ensure game fairness if individual players can benefit from different response times.		Update	WW and MGM MIRAGE	4-5.8.3		MMOL does not currently offer
GGG Requirement	450	The IGS will ensure player fairness in the event of a communication loss to one or more end player devices a multi player game		Update	WW and MGM MIRAGE	4-5.8.4		MMOL does not currently offer
GGG Requirement	451	Multi-player games where a player's entitlements may be affected by being excluded, will implement some reasonable form of monitoring player connection time-outs.		Update	WW and MGM MIRAGE	4-5.8.5		MMOL does not currently offer
GGG Requirement	452	The IGS will provide for host initiated exclusions for multi player games of this type.		Update	WW and MGM MIRAGE	4-5.8.6		MMOL does not currently offer
GGG Requirement	453	Game rules will cater for situations where the IGS loses connectivity with the player.		Update	WW and MGM MIRAGE	4-5.8.7		MMOL does not currently offer
GGG Requirement	454	Jackpots		Update	WW and MGM MIRAGE	4-6.0		MMOL does not have jackpots
IOM Regulation	455	Every advertisement will contain the URL, or a hyperlink to, MMOL's home page	298-01(3)(3)(1)	Update	WW and MGM MIRAGE	4-7.1		
GGG Requirement	456	Advertising is to be truthful		Update	MGM-MIRAGE	4-7.10		
GGG Requirement	457	Advertising will not bring the commission into disrepute		Update	MGM-MIRAGE	4-7.11		
IOM Regulation / GGS Requirement	458	Advertising can not target people under the age of 18	298-01(3)(3)(3)(d)	Update	MGM-MIRAGE	4-7.12		
GGG Requirement	459	Marketing and advertising will not encourage excessive participation		Update	MGM-MIRAGE	4-7.13		
GGG Requirement	460	Advertising will not imply or convey a message that one's status, general abilities and social success can be attributed to gambling		Update	MGM-MIRAGE	4-7.14		
GGG Requirement	461	Advertising cannot challenge or dare people to participate		Update	MGM-MIRAGE	4-7.15		
GGG Requirement	462	Winning will not be shown out of context with the reality of the return to player and will not promote an unrealistic expectation of winning		Update	MGM-MIRAGE	4-7.16		

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
IOM Regulation	463	Every advertisement will not be indecent or offensive	298-01(3)(3)(2)(a)	Update	WW and MGM MIRAGE	4-7.2		
IOM Regulation	464	Every advertisement will be based on fact	298-01(3)(3)(2)(b)	Update	WW and MGM MIRAGE	4-7.3		
IOM Regulation	465	Every advertisement will not be false, deceptive or misleading in any particular manner	298-01(3)(3)(2)(c)	Update	WW and MGM MIRAGE	4-7.4		
IOM Regulation	466	Every advertisement will not contain any statement as to the legality or otehrwise of online gambling betting in any other jurisdiction	298-01(3)(3)(2)(a)	Update	WW and MGM MIRAGE	4-7.5		
IOM Regulation	467	Every advertisement will not be directed at any jurisdictions in which online gambling, or any kind of gambling is prohibited	298-01(3)(3)(2)(b)	Update	WW and MGM MIRAGE	4-7.6		
IOM Regulation	468	Every advertisement will not have any sexual content	298-01(3)(3)(2)(c)	Update	WW and MGM MIRAGE	4-7.7		
IOM Regulation	469	Every advertisement will not contain any material breach of copyright	298-01(3)(3)(2)(e)	Update	WW and MGM MIRAGE	4-7.8		
IOM Regulation	470	Every advertisement that makes claim as to the potential payout of a game will contain sufficient information to enable a person to determine readily and easily the expected percentage return to him over a period of time, disregarding any exercise of skill by him.	298-01(3)(3)(2)(f)	Update	WW and MGM MIRAGE	4-7.9		
GGG Requirement	471	Part of the registration process will be agreement to the terms and conditions of the site.		Update	WW and MGM MIRAGE	4-8.1.1	Page Specifications and Registration	To register the player will agree to the terms and conditions. This will be a status indicator in the database as to the agreement to the terms and conditions
GGG Requirement	472	The player can only advance to cashless play if they take an action to acknowledge the agreement. This action will be logged in the system for evidentiary purposes.		Update	WW and MGM MIRAGE	4-8.1.2	Free play Functional Specifications	
GGG Requirement	473	Player agreements need to reflect the terms and conditions		Update	WW and MGM MIRAGE	4-8.1.3		
IOM Regulation	474	No online gambling for cash will be carried on unless the player is registered with the operator	297-01(2.1)(a)	Update	WW and MGM MIRAGE	4-8.1.4	Registration Functional Specifications	
IOM Regulation	475	No online gambling for cash will be carried on unless the player holds an account with the operator	297-01(2.1)(b)	Update	WW and MGM MIRAGE	4-8.1.5	Game Platform Overview	
IOM Regulation / GGG Requirement	476	Player will have a valid account before wagering is allowed	297-01(2.1)(a,b)	Update	WW and MGM MIRAGE	4-8.2.1	Sportsbook and Game Platform Overview	
GGG Requirement	477	Prizes won by minors will be forfeited		Update	MGM- MIRAGE	4-8.2.10		
GGG Requirement	478	Forfeited Prizes are taken back into the company, and held in accordance with Isle of Man laws and regulations		Update	MGM- MIRAGE	4-8.2.11		
IOM Regulation / GGG Requirement	479	MMOL will not accept wagers from jurisdictions where it is illegal	297-01(3.3)(iii)	Update	WW	4-8.2.12	Player Logon and Verification Module Functional Specifications	
GGG Requirement	480	If a country notifies MMOL not to accept wagers from that country, it is deemed illegal		Update	WW	4-8.2.13	Player Logon and Verification Module Functional Specifications	
IOM Regulation / GGG Requirement	481	MMOL may use third party sources for verification of identity, age and place of residence and credit risk	297-01(3.3)(ii) & (iii)	Update	MGM- MIRAGE	4-8.2.14	Section 2 of the Verification Module	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	482	Online requests for player information will require substantiation via faxed copies of the original supporting documentation as proof of the identity, age and location of players. Other methods confirming this information will also be considered.		Update	WW and MGM MIRAGE	4-8.2.2		
IOM Regulation / GGS Requirement	483	Player access to site will involve at least a password and Personal Identification Number (PIN)	297-01(5.2)	Update	WW and MGM MIRAGE	4-8.2.3		
GGG Requirement	484	Player winnings paid by check must be paid to the address provided upon registration		Update	WW and MGM MIRAGE	4-8.2.5	Payment and Financial Interface Documents	
GGG Requirement	485	No winnings will be paid in the case of credit card transactions until funds are cleared.		Update	WW and MGM MIRAGE	4-8.2.6	Player Account Management Functional Specifications	
GGG Requirement	486	A challenge question can be used by help desk staff in the event of forgotten password or PIN		Update	WW and MGM MIRAGE	4-8.2.7	Player Logon Functional Specifications	
IOM Regulation / GGS Requirement	487	Player will be over the age of 18, or as other jurisdictions stipulate, but no less than 18	297-01(3.2)	Update	WW and MGM MIRAGE	4-8.2.8	Verification Module Functional Specifications	
IOM Regulation / GGS Requirement	488	MMOL will maintain a list of prohibited jurisdictions	297-01(3.2)	Update	WW and MGM MIRAGE	4-8.2.9	MMOL Business Plan	
GGG Requirement	489	Individuals identified by IOM as "black listed" will not be allowed to re-register		Update	WW and MGM MIRAGE	4-9.0.1	Player Logon	
IOM Regulation / GGS Requirement	490	Inactive accounts will be secure	297-01(9)(4)	Update	MGM-MIRAGE	4-9.0.2		
IOM Regulation / GGS Requirement	491	A player can only have one active casino account at one time	297-01(2)	Update	WW and MGM MIRAGE	4-9.0.3	Player Logon	
GGG Requirement	492	Withdrawals will go to the registered player		Update	WW and MGM MIRAGE	4-9.0.4	Player Account Management Documentation	
GGG Requirement	493	MGM MIRAGE Online attempts to return funds from inactive accounts to the owner. If the owner cannot be located, the forfeited prizes are taken back into the company and held in accordance with Isle of Man laws and regulations		Update	WW and MGM MIRAGE	4-9.0.5		
GGG Requirement	494	Adjustments to accounting on the IGS are subject to strict security control and audit trail.		Update	WW and MGM MIRAGE	4-9.0.6		
IOM Regulation / GGS Requirement	495	Player accounts will be secure from unauthorized access or updates	297-01(9)(1)	Update	WW and MGM MIRAGE	4-9.1.1	Player Account Management Documentation	
GGG Requirement / IOM Regulation	496	A transaction report will be accessible by the player and admin. Displaying winnings, losses and duration of play for each day of the period requested, and totals of these details.	296-01(7)	Update	WW and MGM MIRAGE	4-9.2.1	Player Account Management Documentation	
IOM Regulation	497	A player is not permitted to make withdrawals from his account except to the card account or other financial facility from which the initial deposit was made, and any additional funds not permitted on the initial financial instrument will be sent to the registered player via check	297-01 7(1)(a)	Update	WW and MGM MIRAGE	4-9.3.10		
IOM Regulation	498	A player shall not be permitted to make withdrawals from his account except —if the operator of the card account or other facility will not accept it, by check sent to the player's place of residence as stated in his registration.	297-01(7)(a)(b)	Update	WW and MGM MIRAGE	4-9.3.11	Player Account Management Documentation	
IOM Regulation	499	Where a withdrawal from a player's account is made by cheque exceeding, or cheques exceeding in the aggregate, such amount as the Commissioners may from time to time direct by notice in writing to the operator, the operator shall carry out such additional requests	297-01(7)(2)	Update	WW and MGM MIRAGE	4-9.3.12	Player Account Management Documentation	
IOM Regulation	500	An account will not be opened except by means of a deposit of money - by such means as may be approved by the Commissioners	297-01(1)(a)	Update	WW and MGM MIRAGE	4-9.3.2		
IOM Regulation / GGS Requirement	501	All deposits, withdraws, transfer, adjustments and transactions will be maintained in a system audit log.	297-01(9)(2)	Update	WW and MGM MIRAGE	4-9.3.4	Player Account Management Documentation	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
IOM Regulation / GGS Requirement	502	Funds deposited by Credit card cannot be used until an authorization number is issued recorded.	297-01(4)(a,b)	Update	WW and MGM MIRAGE	4-9.3.5	Orbis Payment Document and Player Account Management Documentation	
IOM Regulation / GGS Requirement	503	Positive identification, including a secondary mechanism (e.g.: PIN) will be made before withdrawal of money	297-01(5)(a,b) & (6)	Update	WW and MGM MIRAGE	4-9.3.6	Player Account Management Documentation	
IOM Regulation	504	MMOL shall provide a player with a means of verifying his identity before any balance on his account may be withdrawn, consisting of —a personal identification number (PIN) sent to his place of residence as stated in his registration,	297-01(5)(a)	Update	WW and MGM MIRAGE	4-9.3.7		
IOM Regulation	505	MMOL will provide a player with a means of verifying his identity before any balance on his account may be withdrawn, consisting of —such other means as may be approved by the Commissioners	297-01(5)(b)	Update	WW and MGM MIRAGE	4-9.3.8		
IOM Regulation	506	A player will not be permitted to make withdrawals from his account unless his identity has been positively verified	297-01(6)	Update	WW and MGM MIRAGE	4-9.3.9		
GGS Requirement	507	MMOL will give a player an electronic identifier to establish a session		Update	WW and MGM MIRAGE	4-9.4.1	Player Logon	Password and User name required to Login to session
GGS Requirement	508	End session if player logs off		Update	WW and MGM MIRAGE	4-9.4.2	Player Logon	The Player ends the session if they Logout
GGS Requirement	509	End the session if a player-inactivity timeout is reached		Update	WW and MGM MIRAGE	4-9.4.3	Player Logon	15 minutes of inactivity automatically ends the session
GGS Requirement	510	MMOL will have the ability to terminate a session and lock out a players account		Update	WW and MGM MIRAGE	4-9.4.4	Orbis Administration Notes and WagerWorks Admin Configuration Functional Specifications	
GGS Requirement	511	When MMOL terminates a session, a record will be kept in an audit file that includes the termination reason		Update	WW and MGM MIRAGE	4-9.4.5	Orbis Administration Notes	
GGS Requirement	512	The system will send a session finished message to the end player's device each time a session is terminated by MMOL.		Update	WW and MGM MIRAGE	4-9.4.6	Player Logon	
GGS Requirement	513	MMOL will not accept a bet/wager from a player in an authorized game/bet type unless a player's account has been established in the name of the player and there are adequate funds in the account to cover the amount of the bet/wager		Update	WW and MGM MIRAGE	5.3.1	Verification Functional Specification Documents	
IOM Regulation	514	The OGS will calculate accurately all taxation and other monies due to the Treasury	296-01(8)(b); IOMDHA006	Update	WW and MGM MIRAGE	5-2.15		
GGS Requirement	515	A full chart of accounts will be provided for MMOL's operations, including detailed procedures to be followed should a change to the chart of accounts be required.		Update	WW	5-2.1		
IOM Regulation / GGS Requirement	516	MMOL will keep a financial institution account, or financial institution accounts, for use for all banking or similar transactions for the operations conducted under the e-gambling license.	IOMDHA006	Update	MGM-MIRAGE	5-2.10		
IOM Regulation / GGS Requirement	517	MMOL will not use a financial institution account other than for the purpose for which it is approved.	IOMDHA006	Update	MGM-MIRAGE	5-2.10		
IOM Regulation / GGS Requirement	518	The Submission will identify how client funds are maintained in separate accounts from those of the Company.		Update	MGM-MIRAGE	5-2.11		
IOM Regulation / GGS Requirement	519	The submission on client funds will identify the regularity at which such transfers are made.		Update	MGM-MIRAGE	5-2.11		
IOM Regulation / GGS Requirement	520	The submission on client funds will identify all reconciliation's between the total of the client's fund accounts and total of all the individual customer account balances.		Update	MGM-MIRAGE	5-2.11		
GGS Requirement	521	The submission on client funds will identify details of separate signatories required for those accounts.		Update	MGM-MIRAGE	5-2.11		
GGS Requirement	522	The submission on client funds will identify independent review of the operation of the client funds accounts.		Update	MGM-MIRAGE	5-2.11		

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	523	The submission on client funds will identify the confirmation that no set off arrangements are in place in relation to those accounts, and that they have not otherwise been used as security for any liabilities of the Company.		Update	MGM-MIRAGE	5-2.11		
IOM Regulation / GGS Requirement	524	The submission on client funds will identify the controls over the transfers to and from the Company's accounts		Update	MGM-MIRAGE	5-2.11 & 5-2.2		
GGG Requirement	525	All instructions issued in relation to the bank account(s) will require the signatories of two of the authorized bank account signatories. The ICOP will state who has the authority to appoint and remove signatories.		Update	MGM-MIRAGE	5-2.13		
GGG Requirement	526	Notification of the appointment or removal of signatories will be provided to the Commission by forwarding a copy of the completed changes of signatory form issued by the bank, together with confirming identity of the signatures.		Update	MGM-MIRAGE	5-2.13		
GGG Requirement	527	Annual statements, other than the first year of operation, will be prepared on a comparative basis for the current and prior fiscal year, and present financial position and results of operation in conformity with generally accepted accounting principles.		Update	MGM-MIRAGE	5-2.16		
GGG Requirement	528	Reporting - MMOL will prepare its financial and statistical reports on an annual basis.		Update	MGM-MIRAGE	5-2.16		
GGG Requirement	529	Reporting - Monthly reports are based on calendar months. Quarterly and annual reports are based on a calendar year.		Update	MGM-MIRAGE	5-2.16		
GGG Requirement	530	The reports will be signed by the appropriate executive officer, and each report will be submitted to the Commission by the required lodgment date.		Update	MGM-MIRAGE	5-2.16		
IOM Regulation / GGS Requirement	531	Filing dates - Monthly reports are due not later than the twentieth calendar day following the end of the month.	296-01(7)	Update	MGM-MIRAGE	5-2.16		
IOM Regulation / GGS Requirement	532	Filing dates - Quarterly reports are due not later than one calendar month after the end of the quarter.	296-01(7)	Update	MGM-MIRAGE	5-2.16		
IOM Regulation / GGS Requirement	533	Filing dates - Annual reports are due not later than the end of the third month after the end of the calendar year.	296-01(7)	Update	MGM-MIRAGE	5-2.16		
IOM Regulation	534	All reports will be available online	296-01(7)	Update	MGM-MIRAGE	5-2.16		
IOM Regulation	535	Reporting Requirements - All financial reports produced by the OGS must be congruent with gaming transaction reports, and conversely. All such reports shall be freely available online to the Commissioners.	296-01(7)	Update	WW and MGM-MIRAGE	5-2.16		
IOM Regulation	536	The OGS must — be capable of producing monthly auditable and aggregate financial statements of gaming transactions.	296-01(8)(a)	Update	WW and MGM-MIRAGE	5-2.16		
GGG Requirement	537	Monthly status reports to the Commission will include any malfunctions, the reason, solution and possible "damage control" required.		Update	MGM-MIRAGE	5-2.16		
IOM Regulation	538	Reporting Requirements - All financial reports produced by the OGS must be congruent with gaming transaction reports, and conversely. All such reports shall be freely available online to the Commissioners.	296-01(7)	Update	MGM-MIRAGE	5-2.16		
GGG Requirement	539	Quarterly management reports will contain an analysis of bad debts occurring within the reporting period.		Update	MGM-MIRAGE	5-2.16 & 5-2.17		
GGG Requirement	540	The ICOP will contain procedures for reviewing doubtful debts and dealing with bad debts. The procedures will cover debt recovery action and the procedures for writing off a bad debt in the Company's accounts will the debt recovery action fail.		Update	MGM-MIRAGE	5-2.17		
GGG Requirement	541	Monthly status reports to the Commission will include any security breach, the reason, solution and possible "damage control" required.		Update	MGM-MIRAGE	5-2.18		
GGG Requirement	542	Monthly status reports to the Commission will include large wins or jackpots paid.		Update	MGM-MIRAGE	5-2.18		
GGG Requirement	543	Monthly status reports to the Commission will include suspicious transactions.		Update	MGM-MIRAGE	5-2.18		
GGG Requirement	544	Monthly status reports to the Commission will include change in management staff.		Update	MGM-MIRAGE	5-2.18		
GGG Requirement	545	Monthly status reports to the Commission will include cash or account disputes, the reason, solution, escalation.		Update	MGM-MIRAGE	5-2.18		
GGG Requirement	546	The ICOP will document the procedures to be followed to ensure compliance with requirements under any applicable Financial Transactions Reporting legislation.		Update	MGM-MIRAGE	5-2.18		
GGG Requirement	547	All IGS financial transactions will be reconciled with the financial institutions at a frequency considered commensurate with the risk. The relevant audit file will be used to reconcile any discrepancies. Accounting procedures will define anomaly considerations associated with reports from non-casino institutions used in the reconciliation process. Note: reconciliation periods may be constrained by financial institution batch processing periods.		Update	MGM-MIRAGE	5-2.2		

Source	Index #	Description	IOM Regulation	Action	Provided By:	WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
IOM Regulation / GGS Requirement	548	Internal control procedures will include the reconciliation of customer accounts and profits and losses arising on the Company's gambling activities.	296-01(8)(a)	Update	MGM-MIRAGE		5-2.2		
GGS Requirement	549	The control system submission will include periodic review and appraisal of the adequacy of the internal controls.		Update	WW		5-2.2		
GGS Requirement	550	The control system submission will include reporting of any material weakness in the controls to the appropriate manager.			WW	Section 19 Fault Management ICOPS	5-2.2		
GGS Requirement	551	The control system submission will set out the detail and frequency of internal management reporting to be carried out		Update	MGM-MIRAGE		5-2.2		
GGS Requirement	552	Details of the computer controls required will be provided for the computerized accounting system.		Update	MGM-MIRAGE		5-2.2		
IOM Regulation / GGS Requirement	553	Internal Control procedures will include the evidence of independent review separate from the person producing the document.	296-01(8)(a)	Update	WW	Document Development and Approval Procedure	5-2.2b		
IOM Regulation / GGS Requirement	554	Internal Control procedures will include the maintenance of full and proper accounting records.	296-01(8)(a)	Update	WW		5-2.2c		
IOM Regulation / GGS Requirement	555	Internal Control procedures will include the adequacy of controls over the safeguarding of both physical and financial assets.	296-01(8)(a)	Update	WW		5-2.2d		
IOM Regulation / GGS Requirement	556	Internal control procedures will include the timing of procedures for the reporting of financial information to management.	296-01(8)(a)	Update	WW		5-2.2e		
IOM Regulation / GGS Requirement	557	Internal control procedures will include the control over the expenditure of funds	296-01(8)(a)	Update	WW		5-2.2f		
GGS Requirement	558	Internal Audit systems will cover system software management, development and change controls.		Update	WW and MGM-MIRAGE		5-2.4	Section 11 Change Management Controls	
GGS Requirement	559	Internal Audit systems will cover legislative compliance.		Update	WW and MGM-MIRAGE		5-2.4	Section 6 Audit ICOPS	
GGS Requirement	560	Internal Audit systems will cover control system compliance.		Update	WW and MGM-MIRAGE		5-2.4	Section 6 Audit and Section 41 Security ICOPS	
GGS Requirement	561	Internal Audit systems will cover technical compliance (including security).		Update	WW and MGM-MIRAGE		5-2.4		
GGS Requirement	562	Internal Audit system will include internal auditing on recurrent procedures.		Update	WW and MGM-MIRAGE		5-2.4		
GGS Requirement	563	Details of the Internal Audit function and responsibilities will be provided including the review of the level of compliance with the ICOP procedures.		Update	WW	Section 6 Audit ICOPS	5-2.4		
GGS Requirement	564	Details of the Internal Audit function and responsibilities will be provided including the reporting of incidences of non-compliance with the ICOP to the appropriate position in the organization.		Update	WW within organization, MGM within their organization	Section 6 Audit ICOPS	5-2.4		
GGS Requirement	565	Details of the Internal Audit function and responsibilities will be provided including the reporting of any material weakness in the ICOP to the appropriate position in the organization.		Update	WW within organization, MGM within their organization	Section 6 Audit ICOPS	5-2.4		
GGS Requirement	566	Details of the Internal Audit function and responsibilities will be provided including the recommendation of change procedures to eliminate any material weakness in the ICOP.		Update		Section 6 Audit ICOPS	5-2.4		
GGS Requirement	567	Details of the Internal Audit function and responsibilities will be provided including the review and appraisal of the adequacy of the ICOP		Update	MGM-MIRAGE		5-2.4		
GGS Requirement	568	Internal Audit Systems - Describe minimum audit and reporting requirements. The audit and reporting requirements set out essential elements of control, which MMOL will be required to establish, implement and maintain. It is expected that MMOL would be able to produce a clear, complete and effective control system that provides a factual and accurate narrative description of the working procedures.		Update	WW and MGM-MIRAGE		5-2.4 & 5-4.0	WagerWorks Admin Configuration Functional Specifications	
GGS Requirement	569	As soon as practicable after the end of the financial year MMOL will cause the books, accounts and financial statements for the operations conducted under the license for the financial year to be audited by an auditor approved by the Commission.		Update	MGM-MIRAGE		5-2.5		

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGs Requirement	570	The appointment of an acceptable auditor will be notified to the Commission within 14 days of the appointment and be accompanied by a copy of the letter of engagement.		Update	MGM-MIRAGE	5-2.5		
GGs Requirement	571	The auditor will complete the audit within 3 months after the end of the financial year and immediately after completion will give a copy of the audit report to MMOL and the Commission.		Update	MGM-MIRAGE	5-2.5		
GGs Requirement	572	Should the auditor resign or be dismissed the Commission will be advised in writing within 10 days of the termination and the auditor will detail the two most recent years of audits with them and explain whether there were any material disagreements with the former audit or on any matter of accounting principles or practices, financial statement disclosures or auditing scope or procedure.		Update	MGM-MIRAGE	5-2.5		
GGs Requirement	573	Details of the accounting software to be used will be included in the ICOP submission. Further, advice as to the method and frequency of fully backing-up the accounting software data will be included together with advice as to the short and long term storage of such data (both on premises and off-site).		Update	MGM-MIRAGE	5-2.8		
GGs Requirement	574	Accounting data entry files will be retained for a period of 7 years and will be maintained in a secure location.		Update	MGM-MIRAGE	5-2.9		
GGs Requirement	575	A compendium of standard forms as well as the records and documents that will be used by MMOL in the conduct of interactive gaming operations will be submitted to the Commission.		Update	WW and MGM-MIRAGE	5-2.9	Installation and User Guides	
GGs Requirement	576	Document control will be maintained by placing document names/numbers and the revision date at the foot of each document.		Update	WW and MGM-MIRAGE	5-2.9	Document Development and Approval Procedure	WW Technical writers will maintain all versions and have a checklist established in distributing the documents.
GGs Requirement	577	The ICOP will also contain a comprehensive description of the procedures for the establishment of a player's account (including on-line account verification procedures if appropriate) and the recognition, recording and accounting for funds (including credit card, cheques, transfers etc.) received from a player for the purpose of gaming or wagering.		Update	WW and MGM-MIRAGE	5-3.0	Verification Specification Documentation and Registration Functional Specification Documents	
GGs Requirement	578	MMOL will not permit a person to participate as a player in an authorized game/bet type unless the person is registered as a player.		Update	WW and MGM-MIRAGE	5-3.0	Player Log on Functional Specifications	
IOM Regulation	579	No person will be registered except on an application for registration in such form, and containing such particulars, as may be approved by the Commissioners.	297-01(3.1)	Update	MGM-MIRAGE	5-3.1	Registration Functional Specifications	
IOM Regulation	580	No person under the age of 18 will be registered.	297-01(3.2)	Update	MGM-MIRAGE	5-3.1.1	Registration Functional Specifications and Verification Module Document	
IOM Regulation	581	Before an applicant for registration is registered, he will provide details of —his age	297-01(3.3)(i)	Update	MGM-MIRAGE	5-3.1.1	Registration Functional Specifications and Verification Module Document	
IOM Regulation	582	Before an applicant for registration is registered, he will provide details of — his identity	297-01(3.3)(ii);	Update	MGM-MIRAGE	5-3.1.1	Registration Functional Specifications and Verification Module Document	
IOM Regulation	583	Before an applicant for registration is registered, he will provide details of —his place of residence	297-01(3.3)(iii)	Update	MGM-MIRAGE	5-3.1.1	Player Logon and Registration Functional Specifications	
IOM Regulation	584	MMOL will use its best endeavours to exclude from registration, and to cancel the registration of, problem gamblers.	297-01(3.3)	Update	MGM-MIRAGE	5-3.1.1	OPERATOR REQUIREMENT Admin rules	
IOM Regulation	585	MMOL will maintain a secure online list of all registrations (current or closed).	297-01(3.4)	Update	MGM-MIRAGE	5-3.1.1	Registration Functional Specifications	
GGs Requirement	586	The MMOL control system submission will set out the procedures for the acceptance of a person as a player.		Update	WW and MGM-MIRAGE	5-3.1.1	Registration Functional Specification Document	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	587	The submission will include details of the procedures for the setting up of new player accounts and specify any checks, which are routinely undertaken in relation to new accounts.		Update	WW and MGM-MIRAGE	5-3.1.1	Verification Specification Documentation and Registration Functional Specification Documents	
IOM Regulation / GGG Requirement	588	The ICOP will contain a detailed description of the procedures for the registration of a person as a player , showing location and age-identifying procedure.	297-01(3.1);( 3.2); & (3.3)(i) / IOMDHA006	Update	WW and MGM-MIRAGE	5-3.1.1	Verification Module Configuration Functional Specifications	
GGG Requirement	589	Dormant Accounts - The procedure will also set out the system dealing with dormant customer accounts where there is either a credit or debit balance. The ICOP will identify how an account will be designated dormant.		Update	MGM-MIRAGE	5-3.10.1		
GGG Requirement	590	Bet/Wager Limits - The procedure for setting bet/wager limits for individual sports, events and customers will be specified.		Update	WW and MGM-MIRAGE	5-3.11	Player Account Management Functional Specifications	
GGG Requirement	591	Registers - MMOL maintain a list of players' bet limits.		Update	WW and MGM-MIRAGE	5-3.11	WagerWorks Admin Configuration Functional Specifications	
GGG Requirement	592	Excluded Customers - The procedure by which any customer may be excluded will be identified. This will specify the reasons why such customers would be excluded, the notification procedures to those customers and the method by which their own account is closed.		Update	WW and MGM-MIRAGE	5-3.12	Verification Configuration Module Specifications	
IOM Regulation / GGG Requirement	593	Money Laundering - The procedures to be followed will specifically address Customer Identification.	297-01(7)(a,b); IOMDHA006	Update	WW and MGM-MIRAGE	5-3.13	WagerWorks Admin Configuration Functional Specifications	
GGG Requirement	594	Money Laundering - The procedures to be followed will specifically address review of suspicious transactions, including substantial deposits and regular small deposits as well as regular depositing and withdrawing of funds without bets/wagers being placed.	IOMDHA006	Update	WW and MGM-MIRAGE	5-3.13	WagerWorks Admin Configuration Functional Specifications	
IOM Regulation / GGG Requirement	595	Money Laundering - MMOL will not encourage a player to hold multiple casino accounts or to transfer funds from one account to the other or to deposit from one credit card or account and withdraw to a different credit card or account.	297-01(2)	Update	WW and MGM-MIRAGE	5-3.13		A player may have multiple accounts one for the casino games and one for sports betting. But the accounts will never merge and the withdrawal from one account will not effect the other account in any way.
GGG Requirement	596	Money Laundering - The submission will also set out the procedures, which is followed when any such suspicious transactions are identified.	IOMDHA006	Update	WW and MGM-MIRAGE	5-3.13.2	WagerWorks Admin Configuration Functional Specifications	
GGG Requirement	597	Payment Processing Procedures - Procedures describing the processing of payments to players will be provided.		Update	WW and MGM-MIRAGE	5-3.14		
GGG Requirement	598	The procedure for dealing with lost customer PIN numbers or passwords will be adequately identified.		Update	WW and MGM-MIRAGE	5-3.2.1	Player Log on Functional Specifications	
GGG Requirement	599	The procedures for the forwarding of a PIN/password to the player via a means independent from the medium being used or the current login session will be considered.		Update	WW and MGM-MIRAGE	5-3.2.1.1	Player Log on Functional Specifications	
GGG Requirement	600	General controls will be included to cover the terms and conditions under which the bet is accepted from the customer.		N/A	MGM-MIRAGE	5-3.3		
GGG Requirement	601	MMOL will not accept a bet/wager from a player in an authorized game/bet type unless the funds necessary to cover the amount of the bet/wager are provided in a way that is acceptable to the Commission.		Update	WW and MGM-MIRAGE	5-3.3		



Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
IOM Regulation	602	MMOL will not accept any stake or bet from a player where, if it is lost in the course of play (either alone or in combination with any other stake or bet), the player's account would be overdrawn		Update	WW and MGM-MIRAGE	5-3.3.1	Player Log on Functional Specifications	
GGG Requirement	603	A detailed description of the procedures for the debiting of losing bets/wagers from the player's account and the crediting of prizes or winnings to the player's account will be included.		Update	WW and MGM-MIRAGE	5-3.4		
GGG Requirement	604	General controls will be included to cover notification of change of location of operations, e.g. Web address, trading name etc...		Update		5-3.5		
GGG Requirement	605	The procedures for changing customer account details, and the authorizations which are necessary for this, will be reported.		Update	WW and MGM-MIRAGE	5-3.5	Player Account Management Functional Specifications	
GGG Requirement	606	A player will be able to withdraw funds up to the current balance of his account at any time. The computer system will not permit the withdrawal of funds in excess of the player's balance. Procedures for the withdrawal of funds by a player from their account will be described in detail in the ICOP.		Update	WW and MGM-MIRAGE	5-3.6	Player Account Management Functional Specifications	
IOM Regulation / GGS Requirement	607	MMOL will not accept a bet/wager from a player unless the player's account has adequate funds in the account or the agreed credit limit will not be exceeded to cover the amount of the bet/wager.	297-01(5.1)	Update	WW and MGM-MIRAGE	5-3.7	Player Log on Functional Specifications	
GGG Requirement	608	Detailed procedures for reviewing rejected transactions together with details of the action that will be taken to secure full settlement of any debt as soon as possible will be included in the ICOP.		Update	WW and MGM-MIRAGE	5-3.7	Player Account Management Functional Specifications	
GGG Requirement	609	Detailed procedures for the acceptance of currencies other than that in which the account is established, including exchange rate conversion procedures, will be included in the ICOP.		Update	WW and MGM-MIRAGE	5-3.8		
GGG Requirement	610	Registers - MMOL will maintain a list of persons in a key relationship with MMOL including the applicable general terms and conditions of that relationship.		Update	WW and MGM-MIRAGE	5-5.2		
GGG Requirement	611	Registers - MMOL will maintain a list of Gambling Equipment maintained by the licensee.		Update	WW and MGM-MIRAGE	5-5.3		
GGG Requirement	612	Registers - MMOL will maintain a list of registered players and player account details (including inactive accounts).		Update	WW and MGM-MIRAGE	5-5.4	See WagerWorks Admin Configuration Functional Specifications and Player Account Functional Specifications	
GGG Requirement	613	Registers - MMOL will maintain a list of excluded players.		Update	WW and MGM-MIRAGE	5-5.5	See Configuration Functional Specifications	
GGG Requirement	614	Registers - MMOL maintain a list of register of assets.		Update	WW and MGM-MIRAGE	5-5.6		
GGG Requirement	615	Registers - MMOL maintain a register of all Contracts/agreements, including those for the purchase of supply of goods or services relating to the operations of the licensee.		Update	WW and MGM-MIRAGE	5-5.7		
GGG Requirement	616	Accountability for Assets - Details of the maintaining of an inventory of assets will be included in the submission and the associated procedures.		Update	WW and MGM-MIRAGE	5-6.1		
GGG Requirement	617	Information Classification - the submission will include details of the protection of the information assets of the license.		Update	WW and MGM-MIRAGE	5-6.2		
GGG Requirement	618	E-Gambling operations list procedures, which will enable employees and players to commence gambling and activities associated with gambling, will be included.		Update	WW and MGM-MIRAGE	6-1.1		
GGG Requirement	619	Recurrent E-Gambling Procedures - An overview of general shift procedures will be given in this section. Including any special procedures that are particular to specific shifts		Update	WW and MGM-MIRAGE	6-1.1		
GGG Requirement	620	End of Day Procedures - will be described in this section.		Update	WW and MGM-MIRAGE	6-1.1		

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	621	Monthly Procedures - Any procedures which will be conducted monthly will be submitted.		Update	WW and MGM-MIRAGE	6-1.4		
GGG Requirement	622	Annual Procedures - Any procedures, which will be conducted at end and beginning of financial year.		Update	MGM-MIRAGE	6-1.5		
GGG Requirement	623	Yearly procedures - Any procedures which will be conducted at end and beginning of financial year will be submitted.		Update	WW and MGM-MIRAGE	6-1.5		
IOM Regulation	624	The OGS must provide over time no more than the expected house advantage to the operator.	296-01(1)(b)	Update	WW and MGM-MIRAGE	6-2.1		
GGG Requirement	625	Gaming - The ICOP submission will describe at a minimum the details of the gaming system		Update	WW and MGM-MIRAGE	6-2.1		
GGG Requirement	626	Requirement for Authentication - Player identification is not required for game products that do not offer monetary payment as prizes.	297-01(2.2)(a,b)	Update	WW and MGM-MIRAGE	Section 7 Authentication and Authorization	6-2.1	
GGG Requirement	627	Requirement for Authentication - All people and computer systems that connect to the IGS will be authenticated.		Update	WW and MGM-MIRAGE	Section 7 Authentication and Authorization	6-2.1	
GGG Requirement	628	Players who connect to the IGS for purposes other than gambling do not need to be authenticated.		Update	WW and MGM-MIRAGE	6-2.1		
GGG Requirement	629	Jackpot - The ICOP submission will describe the details of Jackpot seeding arrangements, jackpot ceiling values, increment rate, reconciliation and monitoring arrangements.		Update	WW and MGM-MIRAGE	6-2.17		
GGG Requirement	630	Jackpot- The ICOP submission will describe procedures for payment, payment limits, authorization, verification procedures.		Update	WW and MGM-MIRAGE	6-2.17		
GGG Requirement	631	Jackpot - The ICOP submission will describe the payment time frame		Update	WW and MGM-MIRAGE	6-2.18		
GGG Requirement	632	Registers - MMOL will maintain a list of authorized games, game packages and/or wagering arrangements/sporting events upon which bets will be accepted.		Update	WW and MGM-MIRAGE	6-3.0	Game List	
GGG Requirement	633	Gaming - The ICOP submission will describe the details of available gaming products.		Update	WW and MGM-MIRAGE	6-3.1		MMOL will provide 3rd party descriptions where applicable
GGG Requirement	634	MMOL's procedures for the setting of odds, and monitoring of the position in relation to all events on which bets are accepted will also be specified.		Update	WW and MGM-MIRAGE	6-3.1	WagerWorks Admin Configuration Functional Specifications	WW products will not allow MMOL to change the odds from those already established by the RNG embedded within the software
IOM Regulation / GGG Requirement	635	Rules - the rules and regulations applicable to each of the games/event for which bets are accepted will be set out as part of the control submission.	296-01(1)(a)	Update	WW and MGM-MIRAGE	6-3.2	Game Specification Functional Documents	MMOL will provide 3rd party descriptions where applicable
GGG Requirement	636	Gaming - The ICOP submission will describe the details of internal controls for gaming.		Update	WW and MGM-MIRAGE	6-3.3		
GGG Requirement	637	Procedures will detail the licensee's arrangements for dealing with all security incidents, both in terms of monitoring the appropriate control following up. This will also detail the monitoring of the automatic logging procedures.		Update	WW and MGM-MIRAGE	Section 41 Security ICOPS	7-1.1.1	
GGG Requirement	638	General controls will be included to cover protecting the privacy of customer information.		Update	WW and MGM-MIRAGE	Section 41 Security ICOPS	7-1.1.1	
GGG Requirement	639	Information security will consider organizational structure and associated responsibilities		Update	WW and MGM-MIRAGE	7-1.1.1	Section 41 Security, Section 45 Staffing ICOPS and Finance Operations and Asset Management Docs	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGs Requirement	640	Information security will consider risk management.		Update	WW and MGM MIRAGE	7-1.1.1	Risk Assessment	
GGs Requirement	641	Information security will consider personnel policy.		Update	WW and MGM MIRAGE	7-1.1.1	Section 45 Staffing and Section 41 Security ICOPS	
GGs Requirement	642	Information security will consider data ownership policy and data handling responsibilities.		Update	WW and MGM MIRAGE	7-1.1.1	Section 45 Staffing and Section 41 Security ICOPS	
GGs Requirement	643	Information security will consider access control and cryptographic controls.		Update	WW and MGM MIRAGE	7-1.1.1	Section 45 Staffing and Section 41 Security ICOPS	
GGs Requirement	644	Information security will consider information flow control.		Update	WW and MGM MIRAGE	7-1.1.1	Section 23 Internal Controls ICOPS	
GGs Requirement	645	Information security will consider security of stored information (database access control)		Update	WW and MGM MIRAGE	7-1.1.1	Section 9 Backup and Recovery and Section 14 Data Management ICOPS	
GGs Requirement	646	Information security will consider monitoring and audit trails.		Update	WW and MGM MIRAGE	7-1.1.1	Section 25 Monitoring and Section 6 Audit ICOPS	
GGs Requirement	647	Information security will consider computer center access policy.		Update	WW and MGM MIRAGE	7-1.1.1	Section 7 Authentication and authorization ICOPS	
GGs Requirement	648	Information security will consider standards, ongoing reviews and reporting procedures.		Update	WW and MGM MIRAGE	7-1.1.1	Section 34 Quality Assurance ICOPS	
GGs Requirement	649	Information Security will consider contingency planning.		Update	WW and MGM MIRAGE	7-1.1.1	Section 9 Back up and Recovery, Section 10 Business Resumption and Disaster Recovery ICOPS	
GGs Requirement	650	Information security will consider security awareness training program.		Update	WW and MGM MIRAGE	7-1.1.1	Section 45 Staffing ICOPS	
GGs Requirement	651	Information security will consider change control policy.		Update	WW and MGM MIRAGE	7-1.1.1	Section 11 Change Management ICOPS	
GGs Requirement	652	Information security will consider firewall modification policy.		Update	WW and MGM MIRAGE	7-1.1.1	Section 11 Change Management ICOPS	
GGs Requirement	653	Information security will consider router modification policy,		Update	WW and MGM MIRAGE	7-1.1.1	Section 11 Change Management ICOPS	
GGs Requirement	654	Information security will consider remote firewall administration policy.		Update	WW and MGM MIRAGE	7-1.1.1	Section 11 Change Management ICOPS	
GGs Requirement	655	Information security will consider network modification policy.		Update	WW and MGM MIRAGE	7-1.1.1	Section 11 Change Management ICOPS	
GGs Requirement	656	Information security will consider system administration staff selection policy.		Update	WW and MGM MIRAGE	7-1.1.1	Section 45 Staffing ICOPS	
GGs Requirement	657	Information security will consider disposal of equipment policy -sanitation procedure.		Update	WW and MGM MIRAGE	7-1.1.1	Section 21 Hardware ICOPS	
GGs Requirement	658	Information security will consider authentication policy for customers and staff.		Update	WW and MGM MIRAGE	7-1.1.1	Section 7 Authentication and authorization ICOPS	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	659	Information security will consider privacy policy.		Update	WW and MGM MIRAGE	7-1.1.1	Section 45 Staffing ICOPS	
GGG Requirement	660	Information security will consider terms and conditions (agreement with the customer).		Update	WW and MGM MIRAGE	7-1.1.1	Finance Operations & Asset Management	
GGG Requirement	661	Information security will consider fraud control policy (repudiation in use of credit card, etc.)		Update	WW and MGM MIRAGE	7-1.1.1	Section 25 Monitoring and Management ICOPS	
GGG Requirement	662	Information security will consider incident response plan.		Update	WW and MGM MIRAGE	7-1.1.1	Section 19 Fault Management ICOPS	
GGG Requirement	663	Information security will consider forensic plan.		Update	WW and MGM MIRAGE	7-1.1.1	Section 20 Forensic Plans ICOPS	
GGG Requirement	664	Procedures used to ensure information integrity and confidentiality of information will be clearly stated including controls and agreements where applicable.		Update	WW and MGM MIRAGE	7-1.1.1	Section 34 Quality Assurance ICOPS	
GGG Requirement	665	The source back-up strategy - The control system submission will include details and strategy of ensuring authorized and tested source code is backed up. This may include Escrow arrangements and/or other methods of securing authorized system software.		Update	WW and MGM MIRAGE	7-1.1.1.1.5	Section 9 Back up and Recovery ICOPS	Source code will be backed up
GGG Requirement	666	Information security infrastructure - The submission will detail the structure in place for controlling information security, and in particular identify the decision making process in this regard.		Update	WW and MGM MIRAGE	7-1.1.1.3.1	Section 4 Administrative Controls ICOPS	
GGG Requirement	667	Third party access security - If remote access to MMOL's betting system is available, this will be detailed and a list of all those with remote access will be maintained. The controls over this, terms of contracts and security checks for non-employees, will also be identified.		Update	WW and MGM MIRAGE	7-1.1.1.3.2		
GGG Requirement	668	Outsourcing - the security requirements in relation to any outsourcing will also be identified.		Update	WW and MGM MIRAGE	7-1.1.1.3.3	Section 3 Acceptable Use ICOPS	
GGG Requirement	669	Security - Intrusion detection procedure will be in place.		Update	WW and MGM MIRAGE	7-1.2.1.15		
GGG Requirement	670	Equipment Security procedures will identify the procedures for monitoring potential external attacks on the system. This will include details of the automatic systems in place, and the procedures for monitoring these by management.		Update	WW and MGM MIRAGE	Section 25 Monitoring and Management ICOPS 7-1.2.17 & 7-1.2.18		WW will not have access to cation and configuration of MMOL firewall
GGG Requirement	671	Security - For internet environments, incident response and forensic plans will be in place.		Update	WW and MGM MIRAGE	7-1.2.18.3	Section 20 Forensic Plans ICOPS	
GGG Requirement	672	Location and regulation of equipment will be in IOM		Update	MGM-MIRAGE	7-1.2.3		
GGG Requirement	673	Network General - Hotline terminal, operator consoles and all intermediate equipment which connect devices to the IGS are to be supported by UPS equipment.		Update	MGM-MIRAGE	7-1.2.7		
IOM Regulation / GGG Requirement	674	The IGS will provide protocols used by operator console connections.	296-01(2)	Update	MGM-MIRAGE	7-1.2.7 & 7-3.2.2.1		
IOM Regulation / GGG Requirement	675	The operating system will be secured to the standard of the best industry practices, including access control applied at the operating system level, minimization and hardening principles.	296-01(2)	Update	WW and MGM MIRAGE	7-1.2.7 & 7-3.2.2.3.1		
IOM Regulation / GGG Requirement	676	There will be a validation tool employed which is able to validate that no unauthorized modification, addition, or removal of Operating System files has occurred.	296-01(2)	Update	WW and MGM MIRAGE	Section 25 Monitoring and Management 7-1.2.7 & 7-3.2.2.3.1	System Security Documentation	
GGG Requirement	677	System Audit Consideration - Details of the audit controls, and the effects on the operation of the system will also be included.		Update	MGM-MIRAGE	7-1.2.9		
GGG Requirement	678	End of day procedures will be described in the Recurrent IT Procedures		Update	WW and MGM-MIRAGE	7-3.1.10		
GGG Requirement	679	Weekly procedures will be put in the IT procedures		Update	WW and MGM-MIRAGE	7-3.1.11		

Source	Index #	Description	IOM Regulation	Action	Provided By:	WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	680	Any procedures which will be conducted monthly will be in the Recurrent IT procedures.		Update	WW and MGM-MIRAGE		7-3.1.12		
GGG Requirement	681	Network General - The IGS will be able to perform a graceful shutdown in the event of a power failure and not restart automatically on power up.		Update	MGM-MIRAGE		7-3.1.2.3		
GGG Requirement	682	Security - Operators will have approved procedures for following reports of security incidents and for ensuring that firewalls are kept up to date with respect to advisory recommendations released after such incidents.		Update	WW and MGM-MIRAGE		7-3.1.3		
IOM Regulation / GGS Requirement	683	The firewall will maintain an audit log of all changes to parameters that affect what connections are permitted through the firewall.	296-01(2)	Update	MGM-MIRAGE		7-3.1.3.2		
IOM Regulation / GGS Requirement	684	The firewall will maintain an audit log of all successful and unsuccessful connection attempts to or through itself.	296-01(2)	Update	MGM-MIRAGE		7-3.1.3.2		
IOM Regulation / GGS Requirement	685	The firewall will disable all communications if the audit log becomes full.	296-01(2)	Update	MGM-MIRAGE		7-3.1.3.2		
IOM Regulation / GGS Requirement	686	It is anticipated that such connections shall be made through at least one approved application-level firewall. This includes connections to and from any non-IGS hosts used by the Operator	296-01(2)	Update	MGM-MIRAGE		7-3.1.3.3		
IOM Regulation / GGS Requirement	687	The design of the firewall systems shall be justified by MMOL by means of a formal risk analysis. The firewall systems shall be consistent with defense-in-depth principles.	296-01(2)	Update	MGM-MIRAGE		7-3.1.3.3	GGG Documentation	
GGG Requirement	688	MMOL will provide the configured access control list.		Update	WW and MGM-MIRAGE		7-3.1.4		
GGG Requirement	689	Repeat play - The communications protocol will detect and reject repeated "play" messages that arise from communication errors and impatient players pressing play more than once while awaiting a response from the IGS (the results will be displayed for a reasonable time before the next "play" message can be accepted).		Update	WW and MGM-MIRAGE		7-3.1.4.3	Interface Protocols	
GGG Requirement	690	The IGS will authenticate itself to all people and computer systems that establish a connection.		Update	WW and MGM-MIRAGE	Section 7 Authentication and Authorization	7-3.1.4.3		
GGG Requirement	691	Equipment Security procedures will detail the nature and the work in configuring the Internet firewall, which is in place to protect the system. This will include the location of the firewall, specifically where servers are located away from the premises, detailing protection provided for all the systems.		Update	WW and MGM-MIRAGE	Section 26 Network and Server Architecture ICOPS	7-3.1.4.5		
GGG Requirement	692	Encrypted Audit Logger - MMOL may desire to have unrestricted access, and make changes to critical parts of the gambling system prior to notification or approval of the Commission. MMOL will document all subsequent changes and report them to the Commission.		Update	WW and MGM-MIRAGE	Section 18 Encryption	7-3.1.7 & 7-3.5		
GGG Requirement	693	Encrypted Audit Logger - Compensating procedural and technical controls to enable risk-based audits will be required to be put in place under such an approval. The compensating controls may involve the monitoring of all root-level activity and direction of audit files to an encrypted government logger.		Update	WW and MGM-MIRAGE	Section 18 Encryption	7-3.1.7 & 7-3.5		
GGG Requirement	694	Gaming - The ICOP submission will describe the procedures for maintenance of the gaming system.		Update	WW and MGM-MIRAGE		7-3.1.8		
GGG Requirement	695	It is recommended that hot standby components be rotated regularly into production use to make sure they are up to date and in working order.		Update	WW and MGM-MIRAGE		7-3.1.8		
GGG Requirement	696	An overview of general shift procedures will be given, including any special procedures that are particular to specific shifts.		Update	WW and MGM-MIRAGE		7-3.1.9		
GGG Requirement	697	All versions and updates will be provided.		Update	WW and MGM-MIRAGE		7-3.2 & 7-4.0	Software Library	
GGG Requirement	698	User Inactivity Timeout - If the system is not capable of polling to confirm connection, it will implement inactivity timeouts.		Update	WW and MGM-MIRAGE		7-3.2 ITCR 3.3.1	Game Platform Overview and WagerWorks Admin Configuration Functional Specifications	The player will be contacted if there is no activity for a length of fifteen minutes.

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GGG Requirement	699	User Inactivity Timeout - The timeout period should be agreed to by the Commission.		Update	WW and MGM MIRAGE		7-3.2 ITCR 3.3.2	Game Platform Overview and WagerWorks Admin Configuration Functional Specifications	Fifteen minute prompt
GGG Requirement	700	User Inactivity Timeout - If a session is terminated or is broken, the end player device will notify the player of session termination. No further game play is permitted until the IGS and the end player device establish a new session.		Update	WW and MGM MIRAGE		7-3.2 ITCR 3.3.3	Game Platform Overview and WagerWorks Admin Configuration Functional Specifications	Fifteen minute prompt
GGG Requirement	701	Compliance with technical requirements - Provide detailed procedures, which describe what will be done to ensure ongoing compliance with technical requirements.		Update	WW and MGM MIRAGE		7-3.2.1 (Technical Compliance Manual)	Section 34 Quality Assurance ICOPS	
GGG Requirement	702	The account balance is not to be credited by the IGS until final confirmation is received from the external wagering system including the amount of the cancellation request.		Update	MGM- MIRAGE		7-3.2.1 ITCR 3.1.10		
GGG Requirement	703	Winner Update- When results are entered and confirmed on the external wagering system, each winning wager placed from the IGS system will be transferred to the IGS with the amount of the win.		Update	WW and MGM MIRAGE		7-3.2.1 ITCR 3.1.11	Player Account Management Functional Specifications and Financial Interface Specifications	
GGG Requirement	704	Winner Update - Players' accounts are to be updated with the winning amounts.		Update	WW and MGM MIRAGE		7-3.2.1 ITCR 3.1.12	Player Account Management Functional Specifications and Financial Interface Specifications	
GGG Requirement	705	Wagering Information - If the external wagering system provides pari-mutuel wagering facilities for the IGS, it will periodically pass the current dividends estimates for active pools to the IGS. Cautionary notes will accompany such estimates.		Update	WW and MGM MIRAGE		7-3.2.1 ITCR 3.1.13	Player Account Management Functional Specifications and Financial Interface Specifications	
GGG Requirement	706	Wagering Information - If the external wagering system provides jackpot facilities for the IGS, it will periodically pass the current jackpot amounts to the IGS. Cautionary notes will accompany such projections.		Update	WW and MGM MIRAGE	Section 30 Network Protocols	7-3.2.1 ITCR 3.1.14	Interface Protocols	
GGG Requirement	707	Wagering Information - If the external wagering system provides fixed price wagering facilities for the IGS where the odds/prize table can be dynamically changed, it will pass the current odds to the IGS whenever any odds are changed.		Update	WW and MGM MIRAGE	Section 30 Network Protocols	7-3.2.1 ITCR 3.1.15	Interface Protocols	
GGG Requirement	708	Wagering Information - The external wagering system will pass change of event status information to the IGS whenever any change occurs including: withdrawn/reinstated selections, altered event starting time, event closed/open, results entered/modified, results confirmed, event abandoned.		Update	WW and MGM MIRAGE	Section 30 Network Protocols	7-3.2.1 ITCR 3.1.16	Interface Protocols	
GGG Requirement	709	Message Authentication - Message authentication will be used with critical message types, such as jackpot wins and PIN transmissions, in order to verify the correct receipt of the message by the gaming machine, host or related equipment.		Update	WW and MGM MIRAGE	Section 7 Authentication and Authorization	7-3.2.1 ITCR 3.1.17	WagerWorks Admin Configuration Functional Specifications	
GGG Requirement	710	If progressive jackpots are implemented, the following functions will be implemented: frequent jackpot status updates from the IGS to participating end player devices and player notification of limitations of updates methodologies.		Update	WW and MGM MIRAGE		7-3.2.1 ITCR 3.1.2		
GGG Requirement	711	Jackpot controller - The jackpot controller is deemed to be part of the IGS even if it is a physically separate controller.		Update	WW and MGM MIRAGE		7-3.2.1 ITCR 3.1.3		
GGG Requirement	712	Jackpot - The ICOP submission will describe the validation procedures.		Update	WW and MGM- MIRAGE		7-3.2.1 ITCR 3.1.3		

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	713	Where a "Master Controller" employs "Slave Controllers" to control a Jackpot these apply: All slaves are to be time synchronised with the Master, the master is to be time synchronised with the IGS. Game result Jackpot win events will be time stamped and the Jackpot controller will ensure that hits registered within a minimum time increment are considered as Simultaneous wins. Prize payout for Simultaneous wins are to be made in accordance with "Multiple Jackpot Winners." The minimum time window is not less than the longest time taken to register that a jackpot has been won, announcing the win on the displays of all participating end player devices, and reset the progressive meters.		Update	WW and MGM MIRAGE	7-3.2.1	ITCR 3.1.4	
GGG Requirement	714	Wagering Process - Wagers placed on the IGS will receive clear acknowledgment of acceptance, partial acceptance or rejection by the external wagering system.		Update	MGM-MIRAGE	7-3.2.1	ITCR 3.1.6	
GGG Requirement	715	Wagering Process- If the cost of the wager is determined by the external system, there will be a positive confirmation sequence in place to enable the player to accept the bet cost and the IGS to determine that there are enough funds in the player's account to meet the wager cost. This activity shall be performed by the IGS system prior to making an offer to an external wagering system.		Update	MGM-MIRAGE	7-3.2.1	ITCR 3.1.7	
GGG Requirement	716	The account balance shall be debited an amount equaling the offer to the external wagering system. The funds shall remain as a pending transaction with details of the offer to the external wagering system logged. On receipt of acknowledgment from the external wagering system the appropriate adjustments shall be made to the "pending" account and the player account.		Update	MGM-MIRAGE	7-3.2.1	ITCR 3.1.8	
GGG Requirement	717	Cancellation requests from the IGS will receive clear acknowledgment of acceptance or rejection by the external wagering system.		Update	MGM-MIRAGE	7-3.2.1	ITCR 3.1.9	
IOM Regulation	718	The OGS must maintain information about significant events as follows —large wins	296-01(10)(a)	Update	WW and MGM MIRAGE	7-3.2.1	ITCR 4.2.1	Registration Functional Specifications and Player Account Management Functional Specifications
IOM Regulation	719	The OGS must maintain information about significant events as follows — transfers of funds in excess of such amount as the Commissioners may from time to time direct by notice in writing to the operator;	296-01(10)(b)	Update	WW and MGM MIRAGE	7-3.2.1	ITCR 4.2.1	Registration Functional Specifications and Player Account Management Functional Specifications
IOM Regulation	720	The OGS must maintain information about significant events as follows —changes made by the operator to game parameters.	296-01(10)(c)	Update	WW and MGM MIRAGE	7-3.2.1	ITCR 4.2.1	Registration Functional Specifications and Player Account Management Functional Specifications
IOM Regulation / GGS Requirement	721	Recordable Events - The IGS will keep records of the following events: player registration or player's account creation and deactivation, changes to player's registration or account details, changes made by MMOL to game parameters, changes made by MMOL to jackpot parameters, new jackpot created, jackpot retired, large wins, jackpot wins, large transfer of funds, loss of communication with an end player device as signified by no response to successive polls or a time out, and player exclusion.	296-01(10)(a,b,c)	Update	WW and MGM MIRAGE	7-3.2.1	ITCR 4.2.2	Registration Functional Specifications and Player Account Management Functional Specifications
IOM Regulation / GGS Requirement	722	Significant Events - External computer systems that affect game outcome or win amounts will maintain a log of date and time stamped significant event if they are not transferred immediately to the IGS.	296-01(10)(a,b,c)	Update	WW and MGM MIRAGE	7-3.2.1	ITCR 4.2.3	Wagerworks Admin Configuration Functional Specifications
IOM Regulation / GGS Requirement	723	Significant Events - The IGS will be able to receive and store all significant events from external computer systems that affect game outcome or win amounts.	296-01(10)(a,b,c)	Update	WW and MGM MIRAGE	7-3.2.1	ITCR 4.2.4	Wagerworks Admin Configuration Functional Specifications
IOM Regulation / GGS Requirement	724	Significant Events - The IGS will be able to provide a means to view significant events including the ability to search for particular event types.	296-01(10)(a,b,c)	Update	WW and MGM MIRAGE	7-3.2.1	ITCR 4.2.5	Wagerworks Admin Configuration Functional Specifications
IOM Regulation / GGS Requirement	725	Significant events - The IGS will be able to prioritize events (log, alarm or disable)	296-01(10)(a,b,c)	Update	WW and MGM MIRAGE	7-3.2.1	ITCR 4.2.6	Wagerworks Admin Configuration Functional Specifications

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGs Requirement	726	The Operator will retain gambling information for a period of seven years.		Update	WW and MGM MIRAGE	7-3.2.1 ITCR 4.3.1	Wagerworks Admin Configuration Functional Specifications	
GGs Requirement	727	All time stamping will be in a single time - UTC.		Update	WW and MGM MIRAGE	7-3.2.1 ITCR 4.3.2	Wagerworks Admin Configuration Functional Specifications	
GGs Requirement	728	Information to be maintained by the IGS for each player will include, Player details, Account details and balance, maximum bet levels and exclusion status, previous accounts and reason for deactivation and session information.		Update	WW and MGM MIRAGE	7-3.2.1 ITCR 4.3.3	Player Account Management Functional Specifications	
IOM Regulation / GGs Requirement	729	Session information to be maintained by the IGS will include, Player ID, Session start and end time, player device details, total monies wagered for session, total monies won for session, funds added to account for session (time stamped), funds withdrawn from account for session (time stamped), time of last successful poll for session, reason for session information and game information for session.	296-01(9)(a,b,c)	Update	WW and MGM MIRAGE	7-3.2.1 ITCR 4.3.4	Player Account Management Functional Specifications	
GGs Requirement	730	Game information to be maintained by the IGS will include, player ID, game identifier and version and game play information for all games played.		Update	WW and MGM MIRAGE	7-3.2.1 ITCR 4.3.5	Wagerworks Admin Configuration Functional Specifications	
GGs Requirement	731	Data Requirements for Commission Logger - All gaming transactions of significance will be logged on the IGS. At a minimum the following will be logged in, Player ID, Game start time according to IGS, account balance at start of game, wager for game (time stamped), contribution to Jackpot pools, game status (in progress, complete, etc.), game result (time stamped), Jackpot win (if applicable), game end time according to IGS, amount won and account balance at end of game.		Update	WW and MGM MIRAGE	7-3.2.1 ITCR 9.5	Wagerworks Admin Configuration Functional Specifications	
GGs Requirement	732	Significant event information to be logged by the IGS will include, Large wins, Large transfers of funds (single and aggregate over defined time period), changes made by Operators to game parameters, changes made by operators to jackpot parameters, new jackpot created, participant added to or deleted from jackpot participation, jackpot win occurs, jackpot retired and player exclusion (including exclusion, request to lift exclusion, and actual lifting of exclusion).		Update	MGM- MIRAGE	7-3.2.1 ITCR 9.6		
GGs Requirement	733	MMOL will justify the number of digits to be used in all fields based on maximum projected performance and business and the value of the least significant digit for all financial transactions.		Update	MGM- MIRAGE	7-3.2.1 ITCR 9.8		
IOM Regulation	734	MMOL acknowledges that the IOM rules are without prejudice to the requirements of any applicable code of practice under section 17F (money-laundering codes) of the Criminal Justice Act 1991.	297-01(10)	Update	MGM- MIRAGE	7-3.2.1.1		
GGs Requirement	735	Software Controls -The ICOP submission will contain a section on compliance with legal requirements which will specify the procedure for resolution of complaints.		Update	MGM- MIRAGE	7-3.2.1.1		
GGs Requirement	736	Software Controls -The ICOP submission will contain a section on compliance with legal requirement which details the fact that the Commission is the Regulator and provide the appropriate contact details.		Update	WW and MGM MIRAGE	7-3.2.1.1	Section 2 Mission ICOPS	
GGs Requirement	737	System Audit Consideration - the submission will detail the time period for which MMOL keeps copies of transaction records as well as the detail of these records. Additionally this will set out the records of amendments, additions and deletions to the transaction records which are maintained.		Update	MGM- MIRAGE	7-3.2.1.2		
IOM Regulation / GGs Requirement	738	The test environment will be isolated physically from the production system.	296-01(2)	Update	WW and MGM MIRAGE	Reference Center See ICOPS	7-3.2.1ITCR1.1.1	WW will provide a test environment for testing agency to test the software all other testing will be owned by the MGM
IOM Regulation / GGs Requirement	739	Third party access will be well documented	296-01(2)	Update	WW and MGM MIRAGE	Section 3 Acceptable Use ICOPS	7-3.2.1ITCR1.1.1.1	
IOM Regulation / GGs Requirement	740	The risk of third party connections will have been considered by the operator and the operator will be comfortable that the risks have been adequately addressed.	296-01(2)	Update	MGM- MIRAGE		7-3.2.1ITCR1.1.1.2	
IOM Regulation / GGs Requirement	741	Security against third party access - A claim as to the adequacy of access controls, firewall procedures and general security levels will be made by the Operator and assessed for compliance.	296-01(2)	Update	MGM- MIRAGE		7-3.2.1ITCR1.1.1.3	



Source	Index #	Description	IOM Regulation	Action	Provided By:	WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
IOM Regulation / GGS Requirement	742	Connections to third party organizations will not use the same secured network path as player connections.	296-01(2)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.1.4		
IOM Regulation / GGS Requirement	743	Security - communications will be encrypted, sensitive information stored in the database will be encrypted, there will be security on data tables, and stringent security of the gaming network including secure isolation from third party organizations.	296-01(2)	Update	WW and MGM MIRAGE	Section 18 Encryption ICOPS	7-3.2.1ITCR1.1.2		
IOM Regulation / GGS Requirement	744	All connections to trusted IGS hosts or components that may have a trust relationship with an IGS host will be justified as sufficiently secure by the Operator/Supplier by means of a formal risk analysis.	296-01(2)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.2.1		
IOM Regulation / GGS Requirement	745	The term "connections" is used in its broadest sense, and includes UDP and TCP data transfers.	296-01(2)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.2.3		
IOM Regulation / GGS Requirement	746	A device in the same broadcast domain as the IGS hosts will not have a facility that allows an alternate network path to be established that bypasses the firewall.	296-01(2)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.2.5		
IOM Regulation / GGS Requirement	747	The firewall computer will be a separate computer system with the following characteristics: only firewall related applications may reside on the firewall computer, and only a limited number of accounts may be present on the firewall.	296-01(2)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.2.6	Network Configuration Diagram	
IOM Regulation / GGS Requirement	748	All data packets addressed to the firewall will be rejected if they arrive on interfaces to networks that are outside the baseline envelope. This is to restrict access to the firewall to authorized workstations inside the baseline envelope.	296-01(2)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.2.7	Network Configuration Diagram	
IOM Regulation / GGS Requirement	749	The firewall will reject all connections except those that have been specifically approved.	296-01(2)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.2.8		
IOM Regulation / GGS Requirement	750	Security - A single firewall is not adequate security.	296-01(2)	Update	WW and MGM MIRAGE	Section 26 Network and Server architecture ICOPS	7-3.2.1ITCR1.1.3		
IOM Regulation / GGS Requirement	751	Self Monitoring - Internet gaming systems will implement self-monitoring of critical components.	296-01(2)	Update	WW and MGM MIRAGE	Section 25 Monitoring and Management ICOPS and System Security Documentation	7-3.2.1ITCR1.1.3.1		
IOM Regulation / GGS Requirement	752	Self Monitoring- These mechanisms shall include network and host intrusion detection and logs, operating system logs, firewall logs, etc.	296-01(2)	Update	WW and MGM MIRAGE	Section 25 Monitoring and Management ICOPS and System Security Documentation	7-3.2.1ITCR1.1.3.2		
IOM Regulation / GGS Requirement	753	Where data is being passed over communication lines such data will be protected, commensurate with the sensitivity of that data. MMOL shall justify the adequacy of all protection mechanisms in relation to all data and the communications media - by means of a formal risk analysis.	296-01(2)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.4.1	GGS Risk Analysis	
IOM Regulation / GGS Requirement	754	A minimum 128 bit encryption key length is required unless a lesser amount can be demonstrated to be adequate.	296-01(2)	Update	WW and MGM MIRAGE	Section 18 Encryption	7-3.2.1ITCR1.1.4.10	System Security Documentation	
IOM Regulation	755	Personal data of a confidential nature, including the following —details of players' bank and other accounts must only be stored in an encrypted or hashed form.	297-01(9)(6)(a)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.4.2a	System Security Document and Database Documentation	
IOM Regulation	756	Personal data of a confidential nature, including the following —card numbers must only be stored in an encrypted or hashed form	297-01(9)(6)(b)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.4.2b	System Security Document and Database Documentation	
IOM Regulation	757	Personal data of a confidential nature, including the following —card expiry dates must only be stored in an encrypted or hashed form	297-01(9)(6)(c)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.4.2c	System Security Document and Database Documentation	
IOM Regulation	758	Personal data of a confidential nature, including the following —expected answers to any questions used to verify a player's identity (eg. mother's maiden name) must only be stored in an encrypted or hashed form	297-01(9)(6)(d)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.4.2d	System Security Document and Database Documentation	
IOM Regulation	759	Personal information numbers (PINs) relating to — bank and other accounts must be stored using an irreversible encryption algorithm.	297-01(9)(7)(a)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.4.3	System Security Document and Database Documentation	

Source	Index #	Description	IOM Regulation	Action	Provided By:	WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
IOM Regulation	760	Personal information numbers (PINs) relating to — players' accounts must be stored using an irreversible encryption algorithm.	297-01(9)(7)(b)	Update	MGM-MIRAGE		7-3.2.1ITCR1.1.4.4	System Security Document, Database Documentation	
GGs Requirement	761	Risk analysis considerations will include the possibility of encryption of the following: encryption keys, PINs or passwords, account numbers and details, money transfers to and from player accounts, jackpot commands and parameters, account balances, wagers, results, credit and debit card details, reports to the commission and Player complaints forwarded to the commission.		Update	WW and MGM MIRAGE		7-3.2.1ITCR1.1.4.5	PGP keys for each member of the team Risk Assessment Documentation	
GGs Requirement	762	Data that is not required to be hidden but will be authenticated will use some form of message authentication technique.		Update	WW and MGM MIRAGE		7-3.2.1ITCR1.1.4.6	PGP keys for each member of the team Risk Assessment Documentation	
GGs Requirement	763	Encryption Key Handling - There will be a secure method implemented for changing the current encryption key set. It is not acceptable to only use the current key set to "encrypt" the next set. An example of an acceptable method of exchanging keys is the use of public key encryption techniques to transfer new key sets.	296-01(2)	Update			8-3.7		
IOM Regulation / GGs Requirement	764	There will be a secure method in place for the storage of any encryption keys. Encryption keys will not be stored without being encrypted themselves.	296-01(2); 297-01(9)(6)(a,b,c,d); & 297-01(9)(7)(a,b)	Update	WW and MGM MIRAGE	Section 18 Encryption	7-3.2.1ITCR1.1.4.8	System Security Documentation	
IOM Regulation / GGs Requirement	765	Disabling of gaming - The IGS will be able to disable or enable all gaming on command. An entry will be made to the audit log (including the reason for any disable) whenever the function is used.	296-01(2)	Update	WW and MGM MIRAGE	Section 18 Encryption	7-3.2.1ITCR1.1.4.9	System Security Documentation	
GGs Requirement	766	Disabling of gaming - The IGS will be able to disable or enable all gaming associated with a particular jxd (e.g. country or territory within that country) on command. An entry will be made to the audit log (including the reason for any disable) whenever this function is used.		Update	MGM-MIRAGE		7-3.2.1ITCR10.1		
GGs Requirement	767	Disabling of gaming - the IGS will be able to disable or enable individual games on command. An entry will be made to the audit log (including the reason for any disable) whenever this function is used.		Update	MGM-MIRAGE		7-3.2.1ITCR10.2	WagerWorks Admin Configuration Functional Specifications	
GGs Requirement	768	Disabling of gaming - The IGS will be able to disable or enable individual player sessions on command. An entry will be made to the audit log (including the reason for any disable) whenever this function is used.		Update	MGM-MIRAGE		7-3.2.1ITCR10.3	WagerWorks Admin Configuration Functional Specifications	
GGs Requirement	769	Self Monitoring - The system will be able to recover from unexpected restarts of its central computers or any of its other critical components.		Update	MGM-MIRAGE		7-3.2.1ITCR10.4	WagerWorks Admin Configuration Functional Specifications	
GGs Requirement	770	Accounting of Mater Resets - The IGS will be able to identify and properly handle the situation where master resets have occurred on other computer systems that affect game outcome, win amount or metering.		Update	MGM-MIRAGE		7-3.2.1ITCR2.1.2		
GGs Requirement	771	Domain Name System Requirements - An Operator of an Internet gaming system will register a recognizable name in the Internet Domain name system. The IGS itself will be registered in the DNS.		Update	MGM-MIRAGE		7-3.2.1ITCR2.1.3		
GGs Requirement	772	The primary server used to resolve DNS queries used in association with the Internet gambling system will be controlled by the operator and located in the secure data center.		Update	MGM-MIRAGE		7-3.2.1ITCR2.1.4		
GGs Requirement	773	There will be at least one secondary server that is able to resolve DNS queries. The secondary servers will be located at a separate premise to the primary server.		Update	MGM-MIRAGE		7-3.2.1ITCR2.1.5		
GGs Requirement	774	Zone transfers between the primary server and the secondary servers will occur at least once every 24 hours.		Update	MGM-MIRAGE		7-3.2.1ITCR2.1.6		
GGs Requirement	775	High Level Protocol - All protocols will use communication techniques that employ widely accepted error detection and/or recovery mechanisms.		Update	MGM-MIRAGE		7-3.2.1ITCR2.1.7		
GGs Requirement	776	High level Protocol - The high level protocol will employ techniques such that it will not lose messages even when one end or the other restarts.		Update	WW and MGM MIRAGE	Section 30 Network Protocols	7-3.2.1ITCR3.2.1	Interface Protocols	
GGs Requirement	777	High level protocol - The higher level protocol will employ techniques such that repeated messages are identified and discarded even when one end or the other restarts.		Update	WW and MGM MIRAGE	Section 30 Network Protocols	7-3.2.1ITCR3.2.2	Interface Protocols	
GGs Requirement	778	High Level Protocol - These requirements do not apply to unsecured messages such as broadcast messages.		Update	WW and MGM MIRAGE	Section 30 Network Protocols	7-3.2.1ITCR3.2.3	Interface Protocols	

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GGG Requirement	779	High level Protocol - All functions of the protocol will be clearly specified in its associated documentation.		Update	WW and MGM MIRAGE		7-3.2.1ITCR3.2.4	Interface Protocols	
GGG Requirement	780	High level Interface with Lower level protocols - System applications will be able to parse all messages in accordance with design to ensure messages are communicated in a planned, approved, reliable and secure manner.		Update	WW and MGM MIRAGE	Section 30 Network Protocols	7-3.2.1ITCR3.2.5	Interface Protocols	
GGG Requirement	781	All account transactions must be backed up so as to be capable of being recovered in case of system failure.		Update	WW and MGM MIRAGE	Section 30 Network Protocols	7-3.2.1ITCR3.2.6	Interface Protocols	
IOM Regulation	782	Data Recovery - In the event of a failure, the IGS will be able to recover all critical information from the time of the last backup to the point in time at which the system failure occurred.	297-01(9)(5)	Update	WW and MGM MIRAGE		7-3.2.1ITCR4.1.1		
IOM Regulation / GGS Requirement	783	Data Recovery - MMOL will have disaster recovery capability sufficient to ensure that player entitlements and auditability up to the point of the disaster are protected.	297-01(9)(5)	Update	WW and MGM MIRAGE	Section 9 Back up and Recovery	7-3.2.1ITCR4.1.2	WagerWorks Admin Configuration Functional Specifications and Game Platform Overview Write only Log	
IOM Regulation / GGS Requirement	784	Data Recovery - The process of all wagering activities between the two systems is not to be adversely affected by restart/recovery of either computer system, wagering transactions are not to be lost or duplicated because of one system or the other.	297-01(9)(5)	Update	WW and MGM MIRAGE	Section 9 Back up and Recovery	7-3.2.1ITCR4.1.3	WagerWorks Admin Configuration Functional Specifications and Game Platform Overview Write only Log	
IOM Regulation / GGS Requirement	785	Data Recovery - All Transactions involving third party organizations will be logged to an appropriate audit file.	297-01(9)(5)	Update	WW and MGM MIRAGE		7-3.2.1ITCR4.1.4	Interface Protocols	
IOM Regulation / GGS Requirement	786	Data Recovery - All Transactions involving moneys are to be treated as vital information to be recovered by the IGS in the event of a failure.	297-01(9)(5)	Update	WW and MGM MIRAGE		7-3.2.1ITCR4.1.5	Interface Protocols	
IOM Regulation / GGS Requirement	787	Data Recovery - The IGS will maintain records of any game that fails to complete and the reason why the game failed to complete. This information is to be treated as vital information to be recovered by the IGS in the event of a failure.	297-01(9)(5)	Update	WW and MGM MIRAGE		7-3.2.1ITCR4.1.6	Wagerworks Admin Configuration Functional Specifications	
IOM Regulation / GGS Requirement	788	Data Recovery - Information sufficient to continue a partially complete game will be retained by the IGS for a period as defined in the approved internal controls. This information is to be treated as vital information to be recovered by the IGS in the event of a failure.	297-01(9)(5)	Update	WW and MGM MIRAGE		7-3.2.1ITCR4.1.7	Game platform overview Write Only Log	
IOM Regulation / GGS Requirement	789	A list of all registrations (current or otherwise) and accounts (active or otherwise) will be maintained.	297-01(9)(5)	Update	WW and MGM MIRAGE		7-3.2.1ITCR4.1.8	Game platform overview See Saved Game States and Write Only Log	
IOM Regulation / GGS Requirement	790	The system will report more than just the player loss. It is to report for each account, for a period of time upon request, deposit, bet, won, withdrawn, money sitting in an account for a period of over 90 days and if large amounts of cash (over a configurable amount) sit dormant in accounts and are moved into and out of accounts over a period of time in a suspicious manner.	297-01(3.4) & 297-01(9)(3)	Update	WW and MGM MIRAGE		7-3.2.1ITCR4.3.11	Wagerworks Admin Configuration Functional Specifications and Registration Functional Specifications	
GGG Requirement	791	Games play information to be maintained by the IGS will include, Player ID, game start time according to logs, account balance at start of game, wager for game (time stamped), contributions to Jackpot pools, game status (in progress, complete etc.), game result (time stamped), Jackpot win (if applicable), game end time according to IGS, Amount won and account balance at end of game.		Update	WW and MGM MIRAGE		7-3.2.1ITCR4.3.12	Wagerworks Admin Configuration Functional Specifications and Player Account Management for reporting players	
IOM Regulation / GGS Requirement	792	The player registration information will be maintained on a secure part of the system.	296-01(9)(d,e,f,g,h,i)	Update	WW and MGM MIRAGE		7-3.2.1ITCR4.3.6	Player Account Management Functional Specifications	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
IOM Regulation / GGS Requirement	793	Source code - All software programs will be well structured and have explanatory comments in the software code with supporting documentation to explain functionality, design structure and operation.	297-01(6.1)(a,b)	Update	WW and MGM MIRAGE	7-3.2.1ITCR4.3.8		
GGS Requirement	794	Source code - The testing agency during the course of a compliance evaluation, will examine program source for internet gaming systems. Accordingly, all source programs are to be provided in machine readable format suitable to the independent Evaluator (which will provide the appropriate non-disclosure agreements). Subsequent releases (after the initial) are also to have source code provided in this way.		Update	WW and MGM MIRAGE	7-3.2.1ITCR5.1	Software Design Documents, Installation Documents, Game Functional Specifications, Game platform documentation	
GGS Requirement	795	Supplied source code shall be exactly as compiled, linked and translated to the equipment to be used. Source code shall not generally reside on IGS machines - exceptions will be justified by a formal risk analysis.		Update	WW and MGM MIRAGE	7-3.2.1ITCR5.2	Change Management Release documentation	
GGS Requirement	796	Source Code - In accordance with good industry practice, the following Software Identification will appear in all source code modules (or be available in the source control software) altered or created and submitted for evaluation/approval. Module name, version number, revision number, brief description of functions performed, edit history, who why and when (of changes made after this date).		Update	WW and MGM MIRAGE	7-3.2.1ITCR5.3	Change Management Release documentation	
GGS Requirement	797	Software Verification - It will be necessary for the IGS Operator and/or its Suppliers to provide a method to the commission to enable confidence to be gained that the software on which evaluation was performed and system testing was conducted is directly equivalent to the software that is finally submitted for live operation.		Update	WW and MGM MIRAGE	7-3.2.1ITCR5.4	Change Management Release documentation	
GGS Requirement	798	Software Verification - MMOL will provide a method of verification that the executable software that is to be used for testing has been compiled from the source code versions submitted to the testing agency.		Update	WW and MGM MIRAGE	7-3.2.1ITCR6.1	Change Management Release documentation	
GGS Requirement	799	Software Changes - If the software changes are required during the integration testing process, all changes will be submitted via the program application source software, examination of differences and compilation verification.		Update	WW and MGM MIRAGE	7-3.2.1ITCR6.2	Change Management Release documentation	
GGS Requirement	800	Software Changes - Release procedures and associated documentation (will exist and be tested, procedures verified etc.).		Update	WW and MGM MIRAGE	Section 11 Change Management, Section 37 Release Management	7-3.2.1ITCR6.3	Change and Release Document
GGS Requirement	801	Software Version Control - All software for all components of the IGS will be maintained under an appropriate software version control system or mechanism. The objective being that the software is secured, and reproducible.		Update	WW and MGM MIRAGE	Section 37 Release management	7-3.2.1ITCR6.4	
GGS Requirement	802	Supervised Production System Installation - MMOL will provide a method to verify that the executable software and static configuration or other nominated files that have been used during the testing process are identical to that which is to operate on the live system. This verification procedure is to occur when new or revised software is installed, periodically (at a frequency justified by the operator in a formal risk analysis) by the Operator and randomly on demand by the commission.		Update	WW and MGM MIRAGE		7-3.2.1ITCR6.5	System Security Documentation
GGS Requirement	803	Game integration procedures (where the games are developed by a third party) will be completed prior to the taking of the "snapshot"		Update	WW and MGM MIRAGE	Section 22 Installation	7-3.2.1ITCR7.1	
GGS Requirement	804	MMOL will provide a method to determine if unapproved programs, command files, fixed data files, etc resides on any component in the gaming system.		Update	WW and MGM MIRAGE		7-3.2.1ITCR7.10	Integration, Installation and Release Documents
GGS Requirement	805	MMOL will provide that a copy of all software be kept in a secure place for audit trail, spot audit and disaster recovery purposes.		Update	WW and MGM MIRAGE	Section 22 Installation, Section 25 Monitoring and Management	7-3.2.1ITCR7.2	
GGS Requirement	806	In order to maintain a controlled environment during the supervised installation process, a dual password scheme will be instituted. After installation, the commission requires that an approved change control procedure and audit trail be in place to manage all changes to the system.		Update	WW and MGM MIRAGE	Section 31 Offsite Storage, Section 10 Business Resumption and Disaster Recovery, Section 9 Backup and Recovery	7-3.2.1ITCR7.3	
GGS Requirement	807	A snapshot/hash of the system will be taken after supervised installation in order to facilitate subsequent identification and auditing.		Update	WW and MGM MIRAGE	Section 41 Security	7-3.2.1ITCR7.4	
GGS Requirement	808	The process of sanitizing and migrating an existing customer database to the new environment will also be supervised.		Update	WW and MGM MIRAGE	Section 22 Installation	7-3.2.1ITCR7.5	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	809	Formal integration testing will not commence on any system if the above steps are not in place. Live operation will not be approved until all formal integration testing is completed satisfactorily.		Update	WW and MGM MIRAGE	7-3.2.1ITCR7.6		
GGG Requirement	810	Integration testing will include all third party systems which interface to the IGS.		Update	WW and MGM MIRAGE	7-3.2.1ITCR7.7		
GGG Requirement	811	Integration testing will include end-to-end testing of all components, including all third party systems. Reconciliation between all components will be demonstrated.		Update	WW and MGM MIRAGE	7-3.2.1ITCR7.8	Integration, Installation and Release Documents	
GGG Requirement	812	Operating system - Operating system performance via a load test will be conducted during evaluation.		Update	MGM-MIRAGE	7-3.2.1ITCR8.6		
GGG Requirement	813	Off site Data logger - Business continuity and protection of player funds are two important factors that dictate requirements for an off-site logger(s). MMOL is primarily interested in protection of player funds, and may provide a logging capability sufficient for complete system recovery. Essentially, should a disaster occur at the site (bomb, power surge, flood etc.) resulting in the destruction of data, it is essential that between the off-site log, a record of player account balances is able to be reconstructed to the last transaction before the disaster.		Update	MGM-MIRAGE	7-3.2.1ITCR8.7		
GGG Requirement	814	To protect transactions from being lost the following will be considered when implementing an off site logger, physical security of off-site loggers, maintenance of data at off-site loggers, e.g. back-up recovery, etc, access control, impact on the IGS performance, in case of failure of off-site logger, and procedures to address general failure of off-site logger.		Update	WW and MGM MIRAGE	Section 9 Backup and Recovery, Section 41 Security	7-3.2.1ITCR9.3	System Security Documents
GGG Requirement	815	Significant event information to be maintained by the IGS will include, Large wins (configurable threshold parameter), large transfers of funds (single and aggregate over defined time period), changes made by Operators to game parameters, changes made by Operators to jackpot parameters, new jackpot created, participant added to or deleted from Jackpot participation, jackpot win occurs, jackpot retired and player exclusion (including exclusion, requests to life exclusion and actual lifting of exclusion).		Update	WW and MGM MIRAGE	Section 9 Backup and Recovery, Section 41 Security	7-3.2.1ITCR9.4	System Security Documents
GGG Requirement	816	Each transaction shall include a sequential transaction number and a date/time stamp relating to the server date/time. Where different transaction server processes write to the same transaction log then each transaction record shall include a unique server identification field.		Update	WW and MGM MIRAGE		7-3.2.1ITCR9.6	Wagerworks Admin Configuration Functional Specifications
GGG Requirement	817	All communications will be recorded in a log as per the requirements of the transaction logs.		Update	MGM-MIRAGE		7-3.2.1ITCR9.7	
GGG Requirement	818	Encryption algorithms are to be theoretically and demonstrably secure against cryptanalytic attacks.		Update	MGM-MIRAGE		7-3.2.1ITCR9.9	
GGG Requirement	819	Operators will have approved procedures for following up reports of weaknesses in encryption algorithms used in their Internet Gaming Systems. Changes to encryption algorithms to correct weaknesses will be implemented. If no such changes are available, the algorithm will be replaced.		Update	WW and MGM MIRAGE		7-3.2.2.3.1	System Security Documentation
GGG Requirement	820	There will be a secure method in place for the storage of any encryption keys. Encryption keys will not be stored without being encrypted themselves.		Update	MGM-MIRAGE		7-3.2.2.3.1	
GGG Requirement	821	The hardware platform and operating system will be proven to be reliable, secure and stable.		Update	MGM-MIRAGE		7-3.2.2.3.1	
GGG Requirement	822	Player accounts on the system will be secured against unauthorized access or update other than by methods approved in writing by the Commissioners		Update	MGM-MIRAGE		7-3.2.2.3.1	
GGG Requirement	823	The following issues will be addressed: how player registration and account information is to be protected from unauthorized access, controls to prevent unauthorized modification to device configuration, access controls on operator console connections to the IGS, and authentication and encryption used by operator consoles.		Update	WW and MGM MIRAGE	Section 18 Encryption	7-3.2.2.3.1.2	This Claim will be incorporated in Phase Two of the site development
GGG Requirement	824	Cryptographic Control - The submission will identify the use of data encryption and other cryptographic controls where appropriate.		Update	MGM-MIRAGE		7-3.2.2.3.1.2	
IOM Regulation / GGS Requirement	825	MMOL will provide details of the physical location of each component of the central IGS, including the location of staff.	297-01(9)(1)	Update	MGM-MIRAGE		7-3.2.2.3.1.2	
IOM Regulation / GGS Requirement	826	Security of System files - The submission will detail the controls in place to ensure that all files, specifically the source files are maintained securely.	297-01(6.1)(a,b)	Update	MGM-MIRAGE		7-3.2.2.3.1.2	
IOM Regulation / GGS Requirement	827	Player registration and account information (including credit card information) is to be protected from unauthorized access.	296-01(2)	Update	WW and MGM MIRAGE		7-3.2.2.3.1.2	Section 41 ICOPS Security and System Security Overview

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGG Requirement	828	Player Account issues to consider include: controls to prevent unauthorized modification to device configuration, access controls on operator console connections to the IGS, authentication and encryption used by operator consoles, and passwords and local certificate pass phrases will be at least 8 (eight) alphanumeric characters long.		Update	WW and MGM-MIRAGE	7-3.2.2.4		This Claim will be incorporated in Phase Two of the site development
IOM Regulation / GGS Requirement	829	Security in Development and support processes - this will report details of the maintenance and support arrangements in place for the betting software, as well as details of arrangements with third parties.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.4	See System Security Overview Documentation	
IOM Regulation / GGS Requirement	830	Security in Development and support processes - the procedure whereby changes can be made to the betting software will be documented. It is expected that version control will be adopted, and that testing schedules and proofs will be prepared from each version adopted. This will include reference to the reasons for changes being incorporated.	297-01(6.1)(a,b)	Update	MGM-MIRAGE	7-3.2.2.4		
GGG Requirement	831	Security in Development and support processes - The submission will also detail the procedure whereby the user manual supporting the system is updated to take account of such changes.		Update	MGM-MIRAGE	7-3.2.2.4		
IOM Regulation / GGS Requirement	832	Software Procedures will define modification procedures and actions to facilitate timely development of any authorized changes to software.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.5	See System Security Overview and support Documentation	
IOM Regulation / GGS Requirement	833	Software Procedures will define problem reporting procedures and actions to facilitate timely resolution of any software problems.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.5	See Change Management Control Documentation	
IOM Regulation / GGS Requirement	834	Software Procedures will be congruent and secure	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.5	See Change Management Control Documentation	
IOM Regulation / GGS Requirement	835	Software Procedures will cover maintaining the application source code in a secure well managed environment.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.5.2	Release Management Documents	
IOM Regulation / GGS Requirement	836	Software Procedures will define the system design and programming procedures and standards and testing strategies.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.5.2	Fault Management Documents	
IOM Regulation / GGS Requirement	837	System Maintenance Controls - The submission will identify any authorization and validity checks, which are incorporated within the betting system.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.5.2	Section 25 Monitoring and Management ICOPS and Release Documents	
IOM Regulation / GGS Requirement	838	System Software Change control will allow urgent software fixes to still occur (without prior Commission approval) but to be regulated.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.6.1	See Section 41 Security Documentation ICOPS	
IOM Regulation / GGS Requirement	839	System Software change control will ensure that changes are congruent and secure, and maintain system verification integrity	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.6.3	Release Management Documents	
IOM Regulation / GGS Requirement	840	System Software Change Control will ensure that changes comply with any Commission requirements and are suitable for approval.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.6.4	Section 25 Monitoring and Management ICOPS	
IOM Regulation / GGS Requirement	841	System Software Change Control will maintain maximum system availability despite software changes.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.7	Section 37 Release Management and Section 11 Change Management ICOPS	
IOM Regulation / GGS Requirement	842	System Maintenance Controls - The submission will detail how the security control requirements are identified and included at the same time as upgrades are proposed.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.7.1	Fault Management Documents	
IOM Regulation / GGS Requirement	843	System Software Change Control will maintain control separation between the producers of the source code and operational aspects.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.7.1	Section 37 Release Management and Section 11 Change Management ICOPS	
IOM Regulation / GGS Requirement	844	Access control- detail of the password and other access controls will be included.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.7.3	Section 37 Release Management and Section 11 Change Management ICOPS	
IOM Regulation / GGS Requirement	845	Access Management - The manner in which different levels of access are granted and the recording of this will be noted.	296-01(2)	Update	WW and MGM-MIRAGE	7-3.2.2.7.4	Section 37 Release Management ICOPS	

Source	Index #	Description	IOM Regulation	Action	Provided By: WW ICOP Section	MMOL ICOP Section	Other Documentation	Notes
GGs Requirement	846	User Responsibilities - The submission will detail the obligations imposed on users in relation to their own access rights.		Update	WW and MGM MIRAGE	7-3.2.3	Section 11 Change Management Controls ICOPS	Currently the source code is developed by WW and the operational side will be performed by MGM - a separation between the two currently exists.
GGs Requirement	847	Network Access - The controls within the network and recording procedure will be noted. This will specifically detail the contracts in relation to off-site and diagnostic access.		Update	WW and MGM MIRAGE	7-3.2.5.2	Section 4 Admin Controls ICOP and Security Document	
GGs Requirement	848	Operating System Access Control - MMOL will detail the systems in place to prevent unauthorized access including authentication tests. This applies in relation to both internal and customer access.		Update	WW and MGM MIRAGE	7-3.2.5.2	Section 4 Admin Controls ICOPS	
GGs Requirement	849	Application access Control - The submission will detail the controls over access to individual parts of the system, particularly with regard to control over access to different parts of the interactive facilities especially customer accounts.		Update	WW and MGM MIRAGE	7-3.2.5.3	Player Registration and WagerWorks Admin Configuration Functional Specifications	User responsibilities will be detailed in the admin tools for the operator
GGs Requirement	850	Monitoring system - The submission will detail all event loggings and monitoring procedures for all customers' access.		Update	WW and MGM MIRAGE	7-3.2.5.4		
GGs Requirement	851	Mobile computing and teleworking - The controls in place with regard to remote access will be fully detailed.		Update	WW and MGM MIRAGE	7-3.2.5.5		Controls will be in place within the software but will be enforced by operator and/or their third party verification processes
GGs Requirement	852	Operational Procedures and Responsibilities - These will include sufficient details of the procedures in place to ensure the correct and secure operation of all software. These will specifically include problem reporting to management procedures and segregation of duties.		Update	WW and MGM MIRAGE	7-3.2.5.6		
GGs Requirement	853	System planning and acceptance - The nature of the betting software in use will be adequately documented, and a manual for its operation will be included.		Update	WW and MGM MIRAGE	7-3.2.5.7	WagerWorks Admin Configuration Functional Specifications	
GGs Requirement	854	System Planning and acceptance - Where the software in use is modified, then details of the testing of that system will be reported, or the proposed testing, if this is yet to be completed.		Update	WW and MGM MIRAGE	7-3.2.5.8	Section31 Offsite ICOPS	
GGs Requirement	855	System Planning and Acceptance - the procedure whereby changes are proposed, planned and made to the betting software will be documented.		Update	WW and MGM MIRAGE	7-3.2.6.1	Section 19 Fault Management ICOPS	
GGs Requirement	856	Protection against malicious software -Details of the anti-virus protection will be set out as part of the submission. This will specifically refer to the systems, which are in place		Update	WW and MGM MIRAGE	7-3.2.6.2	User Manual and WagerWorks Admin Configuration Functional Specifications	
GGs Requirement	857	Housekeeping - Information in relation to the betting software and associated systems will be set out including procedures to ensure information integrity.		Update	WW and MGM MIRAGE	7-3.2.6.2	Section 11 Change Management ICOPS	
GGs Requirement	858	Housekeeping - Information in relation to the betting software and associated systems will be set out including maintenance of operation access logs, and the period for which these are retained.		Update	WW and MGM MIRAGE	7-3.2.6.2	Release Management and Release Platform Sign-off sheet	
GGs Requirement	859	Housekeeping - Information in relation to the betting software and associated systems will be set out including procedures to ensure confidentiality of information.		Update	WW and MGM MIRAGE	7-3.2.6.3	Section 41 Security ICOPS	
GGs Requirement	860	Network Management - The general controls over MMOL's network will be noted.		Update	WW and MGM MIRAGE	7-3.2.6.4	Fault Management, Testing Plan and ICOPS	
GGs Requirement	861	Housekeeping - Information in relation to the betting software and associated systems will be set out including the procedures for the creation of back-up's of the system together with the regularity of this and the period for which they are kept.		Update	WW and MGM MIRAGE	7-3.2.6.4	Section 24 Maintenance ICOPS	

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GGG Requirement	862	Data Security - the submission will identify any authorization and validity checks, which are incorporated within the betting system and procedures to ensure the confidentiality of information.		Update	WW and MGM MIRAGE	7-3.2.6.5	Section 41 Security ICOPS	
GGG Requirement	863	Housekeeping - Information in relation to the betting software and associated systems will be set out including the storage of such back-ups and the testing of the back-up systems.		Update	WW and MGM MIRAGE	7-3.2.6.5		
GGG Requirement	864	Exchange of information and Software - Details of any formal or informal agreements for the exchange of information and software will be detailed together with the controls.		Update	WW and MGM MIRAGE	7-3.2.6.6	Section 9 Backup and Recovery ICOPS	
GGG Requirement	865	Exchange of information and software - Details of all interactive systems to be utilized will be provided.		Update	WW and MGM MIRAGE	7-3.2.6.6		
GGG Requirement	866	Exchange of information and software - Details of the records of such online interaction with customers, including all e-mails sent and received, will also be maintained. This will include details of the back-up, recovery and archiving procedures.		Update	WW and MGM MIRAGE	7-3.2.6.7	Section 9 Backup and Recovery ICOPS	
GGG Requirement	867	Player Authorization - the submission will detail the player authentication process, including documents and controls used.		Update	WW and MGM MIRAGE	7-3.2.6.7	Finance Operations & Asset Management	
GGG Requirement	868	A player verification flag will be available to the on-line gaming application.		Update	WW and MGM MIRAGE	7-3.2.6.7	Section 30 Network Protocols ICOPS	
GGG Requirement	869	Details of the player verification shall be maintained. If on-line, it will be demonstrated that sensitive player data is secured.		Update	WW and MGM MIRAGE	7-3.2.6.7		
GGG Requirement	870	Account Security - The submission will detail the controls and processes that ensure player account security.		Update	WW and MGM MIRAGE	7-3.2.7.1		
GGG Requirement	871	Disaster recovery - MMOL will ensure that, at a minimum, a plan be in place to recover player account information.		Update	WW and MGM MIRAGE	7-3.2.7.1; 6-2.1	Registration Functional Specifications	
GGG Requirement	872	Aspects of Business Continuity Management - The control system submission will demonstrate that an adequate disaster recovery plan is held and that this is subject to periodic review and testing.		Update	WW and MGM MIRAGE	7-3.2.7.1; 6-2.1	Verification Module Functional Specifications, Verification Module Configuration and Manual Verification Module Functional Specifications	
GGG Requirement	873	Communication Configuration Provide Detailed procedures which define how communication systems are configured.		Update	WW and MGM MIRAGE	7-3.2.7.2		
GGG Requirement	874	Encryption/Validating of Transactions will provide detailed procedures, which describe how transactions are validated.		Update	WW and MGM MIRAGE	7-3.3		
GGG Requirement	875	Non-responsive Procedures/Game Problems Provide detailed procedures, which describe what will be done in the even of Non-responsive or problem games.		Update	WW and MGM MIRAGE	7-3.3.12.5	Section 10 Business Resumption and Back up Recovery ICOPS	
GGG Requirement	876	System Testing and Validation Provide detailed procedures, which describe how and by whom the system will be tested. Insert test plan for Stress testing and Functionality testing, integration testing and network testing as is covered in the compliance testing.		Update	WW and MGM MIRAGE	7-3.4.1		
GGG Requirement	877	Authentication - Authentication of people, computer system controlled by MMOL and third party computer systems will be based on a certification method recognized as being currently secure.		Update	WW and MGM MIRAGE	7-3.5		
GGG Requirement	878	An update to the IGS may, in the future, be required to utilize a more secure certification method.		Update	WW and MGM MIRAGE	7-3.6	Section 17 Emergency Procedures ICOPS	
GGG Requirement	879	System testing and validation - provide detailed procedures, which describe how the system validation will be performed.		Update	WW and MGM MIRAGE	7-3.7.1	Section 46 Testing ICOPS	



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GGG Requirement	880	A critical component that fails self-monitoring tests, and cannot be corrected within defined parameters, will be taken out of service immediately and automatically. The component will not be returned to service until there is reasonable evidence that the fault has been rectified.		Update	MGM-MIRAGE	7-3.7.1		
GGG Requirement	881	Fault reporting & escalation procedure - Describe procedures for fault reporting, internal and external escalation, emergency contact numbers, customer care staff, telephone and email support, security breach shutdown and customer support provided by the developer.		Update	WW and MGM MIRAGE	7-3.7.1	Change Management Release documentation	
GGG Requirement	882	Problem escalation procedures will be defined and implemented to address scenarios where a self-monitoring function detects an anomaly and this anomaly cannot be readily corrected or explained.		Update	WW and MGM MIRAGE	7-3.7.2	Section 46 Testing ICOPS	
GGG Requirement	883	An index of all manuals and software will be provided.		Update	WW and MGM-MIRAGE	7-3.8		
GGG Requirement	884	Software Development Environment - The development environment processes will be defined and documented and will consider several requirements, Quality, product, organizational, disaster recovery, security, change management and release, installation, coding standards, testing and submission.		Update	WW and MGM MIRAGE	7-3.8	Section 19 Fault Management ICOPS	
GGG Requirement	885	Testing and submission - the following will be considered for testing and submission, Testing strategy, test schedule, test environment, tools, traceability and accountability, test procedures, test scripts, test checklist, pre-compliance testing and submission packages.		Update	WW and MGM-MIRAGE	7-3.8.1 & 3.8.2	Section 19 Fault Management ICOPS	
GGG Requirement	886	Fault reporting - Several considerations will include: software problem reports, traceability, master issue list, tracking/reporting to management, priority and escalation and help desk.		Update	WW and MGM MIRAGE	7-3.9	Document Library and Build Process Documents	
GGG Requirement	887	Client support will answer the question "How is the IGS Operator supported?"		Update	WW and MGM MIRAGE	7-4.0	Section 10 Business Resumption and Back Up recovery, Section 11 Change Management, Section 16 Development Environment,	
GGG Requirement	888	Quality - Quality design and quality management system certification is not mandatory, but will be provided to increase confidence in the process and minimize business risk		Update	WW and MGM MIRAGE	7-4.11	Testing Plans and Fault Management Documentation	
GGG Requirement	889	Product - The product functionality and design will be documented and that documentation will be current.		Update	WW and MGM MIRAGE	7-4.12	Section 19 Fault Management ICOPS	
GGG Requirement	890	Security - Security of the development environment will be paramount to establish trust and credibility		Update	WW and MGM MIRAGE	7-4.13		
GGG Requirement	891	Change Management and Release - The following will be considered: Change management, build management, compilers, librarian, build configuration, patches/upgrades, source code products, software problem reports, master issue list, documentation update, deployment, other change requests, release procedure and packaging.		Update	WW and MGM MIRAGE	7-4.2	Section 34 Quality Assurance ICOPS	
GGG Requirement	892	Installation/acceptance/validation - MMOL will confirm the software installation, including no modifications from design		Update	WW and MGM MIRAGE	7-4.3	System Architecture Documents and Game Functional Specifications	
GGG Requirement	893	IGS Operator Test Environment - The location of the testing environment will be isolated physically from the production system.		Update	WW and MGM MIRAGE	7-4.7	Section 41 Security ICOPS	
GGG Requirement	894	The testing environment will have all the necessary controls and procedures to ensure that it is secure within acceptable levels of risk and its components are under configuration control. ITSEC equivalent Level 3 configuration control could be considered as a useful guide.		Update	WW and MGM MIRAGE	7-4.8	Section 11 Change Management ICOPS, and Change Management and Release for Development Docs	
GGG Requirement	895	MMOL will have a separate test site to allow for dry-runs of an upgrade installation. Accordingly, an indication of the issues to be considered will include: Change management, fault reporting, escalation, tracking, installation procedures, staff awareness, testing tools, backup and recovery, security, relevance of test configuration to likely non-compliant scenarios, constraints of the test system, and availability of test system to the commission's testing agency.		Update	WW and MGM MIRAGE	7-4.9		

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GGs Requirement	896	There will be a reference system similar to that of the production system, which will be a separate system that enables the IGS operator to test software prior to loading it into the live system.		Update	WW and MGM MIRAGE	7-5.0		
GGs Requirement	897	Once completed, the internal control and operating procedures (ICOP) will be submitted to the Commission for review, and any changes to the ICOP will be submitted as soon as MMOL is reasonably able. How this process is to occur, and the responsibility for ensuring ongoing compliance will be identified.		Update	WW and MGM MIRAGE	7-5.1		
GGs Requirement	898	MMOL will provide 3rd party certification on the company's compliance with the control system submission at the same time as the annual accounts are finalized. Additionally, specific aspects may be reported on at the same time as the annual audit.	296-01(2)	Update	WW and MGM MIRAGE	7-5.2	Testing Plans and Section 19 Fault Management Documentation	
GGs Requirement	899	Game approval procedure - Some games may be securely configured in a database in which case the "build" requirement will not apply.		Update	WW and MGM MIRAGE	7-5.2	Reference Center	
GGs Requirement	900	Definitions of Games will be provided.	296-01(2)	Update	WW and MGM MIRAGE	8-1.0	Section 11 Change Management ICOPS	
GGs Requirement	901	Step 1 Development Environment Audit Responsibility of Accredited Compliance Testing Agent - the testing agency reviews the software development environment for adequate software development controls in place to meet the regulatory requirements.		Update	MGM-MIRAGE	8-1.0		
GGs Requirement	902	Step 2 Game Submission Documentation Responsibility IGS Operator - MMOL provides the submission document to the testing agency for assessment against the applicable sections of the Commission's requirements.		Update	WW and MGM MIRAGE	8-2.1	Build Documents	
GGs Requirement	903	Step 2: Mathematical treatise - This consists of the payable, reel strips, mathematical derivations of the hits per combination and totals, all calculations, credits per winning combinations, RTP % per combination and game total.		Update	WW and MGM MIRAGE	8-2.2	Game Functional Specifications	
GGs Requirement	904	Step 2 Submission file summary will be provided.		Update	WW and MGM MIRAGE	8-2.3.1	ICOPS	
GGs Requirement	905	Step 3 Game Submission Responsibility IGS Operator - MMOL provides the testing agency with the "Packaged" games as per the Game Developer's game development software requirements.		Update	WW and MGM MIRAGE	8-2.4.1	Game Submission Documentation	
GGs Requirement	906	Step 2 Game specifications will be provided.		Update	WW and MGM MIRAGE	8-2.4.1.1	PC sheets and Math models	Two review processes are done prior to completion
GGs Requirement	907	Step 4 Game submission Format Responsibility IGS Operator - MMOL submits the game files to the testing agency in a zipped file encrypted using PGP. The file name is to be submitted in the following format: IGS Operator_Game Identification Name_Sub#_DDMMYY_HHMM.		Update	WW and MGM MIRAGE	8-2.4.2	Game Submission Documentation	
GGs Requirement	908	Step 4 Submissions are preferred on CD or via FTP site.		Update	MMOL	8-2.4.2		
GGs Requirement	909	Step 4 Submission will be in the same format as the Games developer's file structure.		Update	WW and MGM MIRAGE	8-2.4.3	Game Submission Documentation	
GGs Requirement	910	Step 2 Game design documentation will be provided. For clone games, only the game interface documentation is required as part of the game design documentation.		Update	MMOL	8-2.4.3		
GGs Requirement	911	Step 5 Submission review Responsibility Accredited Compliance Testing Agent - verifies the contents of the submission document against the submission file summary. The testing agency reviews the submission documentation and reconciles this against the design submission. If new game features are added, then a review of the game engine is also required.		Update	WW and MGM MIRAGE	8-2.4.3	FTP	
GGs Requirement	912	Step 2 Source code file modules will be provided.		Update	WW and MGM MIRAGE	8-2.4.3	Game Submission Documentation	
GGs Requirement	913	Step 2 Resource files will be provided.		Update	WW and MGM MIRAGE	8-2.4.4	Game Submission Documentation	
GGs Requirement	914	Step 2 any other relevant documentation and software based on games submitted such as empirical test tool for running a game/test simulator/test driver for poker and blackjack or any other games which require decisions based on strategy.		Update	Testing agent	8-2.4.4		

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GGs Requirement	915	Step 6 Testing Process Responsibility Accredited Compliance Testing Agent - Empirical tests conducted, facilitated by automated testing scripts. If faults are found, a bug list is sent to MMOL. MMOL repairs the bugs, re-creates the game submission package and re-submits it to the testing agency. This becomes a second submission for the game so the submission package name is modified to show the submission number, as increment +1 and date and time fields would be changed. The process continues with a new submission number for each iteration until all issues have been resolved.		Update	WW and MGM MIRAGE	8-2.4.5	Game Submission Documentation	
GGs Requirement	916	Step 7 Testing Agency Report Responsibility Accredited Compliance Testing Agent - The testing agency prepares a report on the games and sends it to the IGS Operator.		Update	WW and MGM MIRAGE	8-2.4.6	Game Submission Documentation	
GGs Requirement	917	Step 8 Initial Security of the game package Responsibility Accredited compliance testing agent - The testing agency performs the software verification process on the final submission pack recommended for approval and secures it with a "hash value"		Update	WW and MGM MIRAGE	8-2.4.7	System Architecture Documents and Game Functional Specifications	
GGs Requirement	918	Step 9 IGS Operator Maintains security of the games package Responsibility of IGS Operator - MMOL will maintain an exact copy of the final submission pack recommended for approval in a secure manner using the testing agency's PGP key for integration with the Game Developer's software.		Update	Testing agent	8-2.5.1		
GGs Requirement	919	Step 10 Scheduling the build responsibility IGS Operator - MMOL will schedule the Supervised Build by arranging suitable times for the Developer to conduct the Build under the testing agency's supervision. This will involve the installation of the "game" file onto the IGS system by MMOL under the testing agency's supervision.		Update	Testing agent	8-2.5.2		
GGs Requirement	920	Step 11 Verification of the secured games package Responsibility accredited Compliance testing agent - The testing agency verifies that the games submission pack maintained by MMOL is the same as that provided to the testing agency by performing the software verification comparing it with the testing agency's "hash value"		Update	Testing agent	8-2.5.3		
GGs Requirement	921	Step 12 Supervision of the games build responsibility accredited compliance testing agent - The testing agency will supervise the Games file build performed by the Developer. The testing agency will perform the software verification process. At the same time, the testing agency will also supervise MMOL applying their electronic signature to the game file.		Update	MMOL	8-2.5.4		
GGs Requirement	922	Step 13 Integration of Graphics responsibility IGS Operator - System integration. Host system developer integrates the graphics, client and engine files into the system.		Update	MMOL	8-2.6.1		
GGs Requirement	923	Step 14 Verification of Games Package responsibility IGS Operator -system developer reconciles the graphics and button functionality against the approved documentation. The testing agency conducts a functional review of implementation.		Update	Testing agent	8-2.6.2		
GGs Requirement	924	Step 15 Final testing of games responsibility Accredited compliance testing agent - The testing agency will ensure that any outstanding tests, as outlined in the Final Game testing report for each game, are conducted at the time of integration and prior to going live.		Update	Testing agent	8-2.6.3		
GGs Requirement	925	Step 16 Games to the commission Responsibility Accredited Compliance Testing agent - The testing agent will ensure that any outstanding tests, as outlined in the final game testing report for each game, are conducted at the time of integration and prior to going live.		Update	MMOL	8-2.7.1		
GGs Requirement	926	Step 17 Recommendation responsibility accredited compliance testing agent - The testing agency makes a recommendation to the Commission.		Update	MMOL	8-2.7.2		
GGs Requirement	927	Step 18 Commission approval responsibility IGS operator - Commission will be notified of MMOL's intent to operate in a live environment before going live.		Update	Testing agent	8-2.7.3	GGs Documentation	
GGs Requirement	928	Step 19 Commission Verification responsibility IGS Operator - reconciliation Commission inspector is notified that installed software is reconcilable with assessed software.		Update	Testing agent	8-2.7.4	GGs Documentation	
GGs Requirement	929	Software Update Step 1 Supervised Build - commission, or its representative, supervised build of the internet system.		Update	Testing agent	8-2.7.5	GGs Documentation	
GGs Requirement	930	Software Update Step 10 - Go live	296-01(2)	Update	MMOL	8-2.8.1		
GGs Requirement	931	Software Update Step 2 Distribute CDs - Copy all binaries + source to C.D. (WORM) x 2. One copy to the Commission and one copy to operational site (use a hash # to verify)	296-01(2)	Update	MMOL	8-2.8.2		
GGs Requirement	932	Software Update Step 3 Production of Data File - A data file is prepared by the Developer that contains all file names to be reconciled on the live system and the location of all files to be reconciled. This data file is called "Sys_Data.txt" This is password protected and is delivered to the Commission with a note indicating the release number this file is associated with.	296-01(2)	Update	WW and MGM MIRAGE	8-3.1		

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	933	Software Update Step 4 Produce Reports - For each change to the software between the previous release and the current release the Developer will provide a report with five sections covering a description of bug(s) extracted from bug database or change request(s), report differences between files at a source level, provide the new source with comments, provide evidence of module tests, and provide evidence of integration tests.		Update		8-3.10		
GGG Requirement	934	Software Update Step 5 Commission Assessment - Assessment of report and possible analysis at the code level on the development system by Commission or agent.	296-01(2)	Update	WW and MGM MIRAGE	8-3.2		
GGG Requirement	935	Software Update Step 6 Commission Approval - Letter of Approval from commission.	296-01(2)	Update	WW and MGM MIRAGE	8-3.3		
GGG Requirement	936	Software Update Step 7 Installation on test system - Software installed on the MMOL's test system.	296-01(2)	Update	WW	8-3.4	Section 11 Change Management ICOPS and Change and Release documentation	
GGG Requirement	937	Software Update Step 8 Verification of Package - MMOL to verify that the release that will be installed actually is that release and is complete. This report will be provided to the Commission.	296-01(2)	Update	WW	8-3.5	Receives from GGS	
GGG Requirement	938	Software Update Step 9 Verification of Installed Software - Inspectors to reconcile software installed on gaming system against software provided at the time of build utilizing source to executable software reconciliation. Written authorization to MMOL to proceed with upgrade and switchover to latest release.	296-01(2)	Update	WW COMPLIANCE FINISHED	8-3.6		

# **Appendix**

## **Isle of Man Online Gambling Regulatory Act 2001 and Gaming Regulations**

## ONLINE GAMBLING REGULATION ACT 2001

### Chapter 10

#### Arrangement of sections

##### *Control of online gambling*

1. Meaning of "online gambling" etc.
2. Restrictions on online gambling
3. Exclusion of certain activities
4. Licensing of online gambling
5. Licence fees and duties
6. Conditions of licence
7. Duration of licences
8. Renewal of licences
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##### *Enforcement*

11. Duties of Commissioners
12. Obligations of holder of licence
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15. Control of management, advertising etc.
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19. Appeals
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*Online Gambling Regulation Act 2001*

Schedule      Amendment of enactments



Signed in Tynwald: 15th May 2001  
Received Royal Assent: 15th May 2001  
Announced to Tynwald: 15th May 2001  
Passed: 15th May 2001

## AN ACT

to provide for the regulation of certain forms of  
gambling carried on by means of  
telecommunications; and for connected purposes

**W**E, your Majesty's most dutiful and loyal subjects, the Council and Keys of the said Isle, do humbly beseech your Majesty that it may be enacted, and be it enacted, by the Queen's Most Excellent Majesty, by and with the advice and consent of the Council and Keys in Tynwald assembled, and by the authority of the same, as follows (that is to say):—

### *Control of online gambling*

#### **1. Meaning of "online gambling" etc.**

- (1) In this Act "online gambling" means —
  - (a) any gaming, where any player enters or may enter the game, or takes or may take any step in the game, by means of a telecommunication,
  - (b) the negotiating or receiving of any bet by means of a telecommunication, or
  - (c) any lottery in which any participant acquires or may acquire a chance by means of a telecommunication.
- (2) For the purposes of this Act, a person "conducts" online gambling where —
  - (a) in the case of gaming or a lottery, he takes part in its organisation, management or promotion;
  - (b) in the case of a bet, he carries on any business involving the negotiating or receiving of the bet; or
  - (c) he maintains, or permits to be maintained, in the Island any computer or other device on or by means of which the game or lottery is operated, or the bet is received, as the case may be.



(3) A service provider shall not be treated as conducting online gambling by reason only that, in the course of a business, he handles electronic communications on behalf of another person with whom he is not associated.

(4) In subsection (3) —

"associated" shall be construed in accordance with section 8(5) and (6) of the Fair Trading Act 1996<sup>1</sup>;

other expressions have the same meanings as in section 10 of the Electronic Transactions Act 2000<sup>2</sup>.

## **2. Restrictions on online gambling**

(1) Subject to section 3, any person who conducts any online gambling, otherwise than in accordance with a licence granted under section 4 to that person or to a company of which he is a director or employee, is guilty of an offence.

(2) Any person conducting online gambling who permits —

(a) a minor, or

(b) a person who at the material time is in a prescribed country or territory,

to participate in the online gambling is guilty of an offence.

(3) It shall be a defence for any person charged with an offence under subsection (2) to prove that the contravention occurred without his consent or connivance and that he exercised all due diligence to prevent it (and, in particular, that he took all such steps as may be prescribed for the purpose of ensuring that such persons do not participate in online gambling).

## **3. Exclusion of certain activities**

(1) Subject to subsection (2), nothing in section 2(1) applies to —

(a) a betting transaction effected by a licensed bookmaker and authorised by a betting office licence under Part II of the Gaming, Betting and Lotteries Act 1988<sup>3</sup> ("the 1988 Act");

(b) any activity connected with the organisation, management or promotion of a lottery declared not to be unlawful by —

(i) section 30, 31, 32, 34A, 35 or 36 of the 1988 Act, or

(ii) section 1 of the National Lottery Act 1999<sup>4</sup>;

(c) the playing at a casino of a prescribed game (within the meaning of the Casino Act 1986<sup>5</sup>);

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<sup>1</sup> 1996 c.15

<sup>2</sup> 2000 c.

<sup>3</sup> 1988 c.17

<sup>4</sup> 1999 c.6

- (d) a contract to which section 22A of the Investment Business Act 1991<sup>6</sup> applies;
  - (e) a contract the effecting of which constitutes the carrying on of insurance business within the meaning of the Insurance Act 1986<sup>7</sup>;
  - (f) any other activity prescribed for the purpose of this section.
- (2) Regulations may provide that, notwithstanding subsection (1), section 2(1) shall apply to any activity or other matter mentioned in that subsection unless it complies with such conditions as are prescribed.

#### **4. Licensing of online gambling**

(1) The Department of Home Affairs ("the Department") may grant to a person named therein, being a company limited by shares and incorporated in the Island, a licence authorising it to conduct online gambling —

- (a) of any prescribed description, or
  - (b) of such prescribed descriptions as are specified in the licence.
- (2) The Department shall not grant a licence to any company unless it is satisfied —
- (a) that the company is under the control of a person or persons of integrity;
  - (b) as to the beneficial ownership of the share capital of the company;
  - (c) that the activities of the company are under the management of a person or persons of integrity and competence; and
  - (d) that the company has adequate financial means available to conduct online gambling of the descriptions in question.
- (3) Before granting a licence the Department shall consult —
- (a) the Treasury;
  - (b) the Isle of Man Gaming Control Commissioners ("the Commissioners"),
  - (c) the Financial Supervision Commission,
  - (d) the Chief Constable, and
  - (e) the Isle of Man Data Protection Registrar.
- (4) The Department shall not be required to give reasons for refusing a licence.
- (5) No licence may be granted so that —

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<sup>5</sup> 1986 c.16

<sup>6</sup> 1991 c.18

<sup>7</sup> 1986 c.24

- (a) there are more than 3 such licences in force at any time, or
  - (b) more than one licence is held by any person at any time.
- (6) The Council of Ministers may by order vary the number of licences specified in subsection (5)(a), but not so as to affect any licence in force at the time the order is made or the renewal of any such licence.
- (7) An order under subsection (6) shall not have effect unless it is approved by Tynwald.

## **5. Licence fees and duties**

(1) An applicant for a licence shall pay to the Treasury on an application for the grant of a licence such fee as is prescribed.

- (2) The holder of a licence shall pay to the Treasury —
- (a) on the grant of a licence, and
  - (b) on each anniversary of the grant of the licence, for as long as the licence remains in force,

such annual fee as is prescribed.

(3) The holder of a licence shall pay to the Treasury, at such intervals and in such manner as are prescribed, a duty of excise, to be known as "online gambling duty", amounting to the prescribed proportion of the gross gaming yield of any online gambling conducted pursuant to the licence in such periods as are prescribed.

(4) For the purpose of subsection (3) "the gross gaming yield", in relation to any online gambling, means —

- (a) the total amount of all bets or stakes made, and the price of all chances sold, less
- (b) the value of all winnings and prizes due,

in the course of the online gambling during the period in question.

(5) The value of winnings and prizes due otherwise than in sterling money shall, for the purpose of subsection (4), be calculated in such manner as is prescribed.

(6) For the purpose of collecting and enforcing online gambling duty the provisions of sections 121, 123 and 124A to 124G of the Customs and Excise Management Act 1986<sup>8</sup> shall apply, subject to such modifications as are prescribed, as if the holder of a licence were a revenue trader within the meaning of that Act.

(7) In this section "prescribed" means prescribed by order made by the Treasury.

(8) An order under this section shall not have effect unless it is approved by Tynwald.

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<sup>8</sup> 1986 c.34

**6. Conditions of licence**

(1) The authorisation conferred by a licence shall be subject to such conditions as are specified in the licence.

(2) The conditions of a licence shall include conditions requiring the holder of the licence —

- (a) to provide such security (real or personal or both), and to maintain such deposits and reserves, as are specified in or determined in accordance with the licence for the payment of debts arising out of online gambling conducted by him;
- (b) to notify the Commissioners forthwith if it realises or calls upon any such security or draws on any such deposits or reserves (including any new or substituted security, deposits or reserves provided under paragraph (c)); and
- (c) in the case mentioned in paragraph (b), to comply with any directions of the Commissioners as to the provision of substituted security, deposits or reserves.

(3) If a condition of a licence is contravened the holder of the licence is guilty of an offence.

**7. Duration of licences**

(1) Subject to section 8(2), a licence, unless it is cancelled or surrendered, shall remain in force for such period, not exceeding 5 years, as may be specified in it, beginning on such date as is so specified.

(2) The holder of a licence may surrender the licence by notice in writing to the Department.

(3) The cancellation, surrender or expiry of a licence shall not affect any liability for anything done or omitted to be done before the date on which it ceases to have effect.

**8. Renewal of licences**

(1) The holder of a licence may, not later than the date of its expiry, apply to the Department for the renewal of the licence.

(2) Where an application is made under subsection (1), the licence shall continue in force —

- (a) until the determination of the application, or
- (b) if the application is refused, until the expiration of 21 days from the date on which notice of the refusal is given to the applicant or, where an appeal is made under section 19, until the appeal is abandoned or determined.

(3) Sections 4 to 7 (except section 4(4)) apply, with any necessary modifications, to the renewal of a licence as they apply to the grant of a licence.

## **9. Variation and transfer of licence**

(1) The Department may, on an application by the holder of a licence or of its own motion, vary a licence by adding a prescribed description of online gambling to, or deleting a description of online gambling from, the descriptions specified in the licence.

(2) Subject to section 6(2), the Department may, on an application by the holder of a licence or of its own motion, vary or cancel any condition specified in the licence.

(3) A variation of a licence, or of a condition of a licence, made otherwise than an application by the holder shall not have effect until the expiration of 21 days from the date on which notice of it is given to the applicant or, where an appeal is made under section 19, until the appeal is abandoned or determined.

(4) The Department may, on an application by the holder of a licence, transfer a licence to a person specified in the application.

(5) A transfer under subsection (4) shall be endorsed on the licence.

(6) Sections 4(2) to (4) and (5)(b) applies, with any necessary modifications, to a transfer of a licence as it applies to the grant of a licence.

(7) Sections 5(1), (7) and (8) applies, with any necessary modifications, to an application for —

- (a) the variation of a licence, or of a condition of a licence, or
- (b) a transfer of a licence,

as it applies to the grant of a licence.

## **10. Designated official**

(1) A licence, and a transfer of a licence, shall not come into force until at least one designated official in relation to the licence has been approved by the Commissioners.

(2) A designated official, in relation to a licence, is an individual nominated by the holder or transferee, as the case may be, of the licence who is —

- (a) a director of the holder or transferee of the licence, and
- (b) resident in the Island.

(3) The Commissioners shall not approve an individual as a designated official unless they are satisfied that he is a person of integrity and competence, and shall withdraw such approval if they cease to be so satisfied.

- (4) If —
  - (a) the Commissioners withdraw their approval of a designated official, or
  - (b) a designated official —
    - (i) dies; or
    - (ii) ceases to be resident in the Island; or
    - (iii) ceases to be a director of the holder of the licence,

and (in either case) there is no other designated official approved by the Commissioners in relation to the licence, the holder of the licence shall apply to the Commissioners for the approval of another person, being such an individual as is mentioned in subsection (2), in his place.

- (5) If —
  - (a) the holder of the licence fails to comply with subsection (4) within the period of 6 weeks beginning with the event referred to in that subsection, or
  - (b) the Commissioners refuse an application under subsection (4) without specifying a period within which a further application may be made,

the licence is suspended from the end of the relevant period until another designated official is approved by the Commissioners.

In this subsection "the relevant period" means the period of 6 weeks referred to in paragraph (a), or any period specified as that within which a further application may be made, as the case may be.

(6) The name and address of every designated official for the time being approved under this section shall be endorsed on the licence.

- (7) Where any provision of this Act or regulations —
  - (a) imposes any criminal or other liability on the holder of a licence, or
  - (b) provides for any power to arise or anything to happen on the conviction of the holder of a licence,

the reference to the holder includes a reference to any person who at the material time is or was a designated official in relation to the licence.

### *Enforcement*

## **11. Duties of Commissioners**

- (1) The Commissioners shall, subject to the provisions of this Act and of regulations, —
  - (a) supervise the operation of any online gambling conducted in the Island;

- (b) investigate the character and financial status of any person applying for or holding any licence or otherwise concerned with the operation of any online gambling conducted in the Island; and
- (c) ensure that all fees payable to the Treasury by a person conducting online gambling in the Island are duly paid and accounted for;

with a view to securing that online gambling is fairly and properly conducted, and that the provisions of this Act and regulations, and the conditions of any licences, are complied with.

(2) For the purpose of enabling the Commissioners to perform their duties under subsection (1) the Department shall —

- (a) engage the services of such persons, being persons qualified and experienced in the fields of —
  - (i) accountancy,
  - (ii) the auditing of computer software, and
  - (iii) statistics and the theory of probability; and
- (b) make such arrangements with the Civil Service Commission for the appointment or secondment of other persons (being members of the Isle of Man Civil Service).

(3) The terms on which persons may be engaged under subsection (2)(a) shall be such as the Department with the consent of the Treasury may determine.

(4) The Treasury and the Chief Constable shall supply to the Commissioners and the Department such information in their possession relating to holders of and applicants for licences, and officers and servants of those persons, as the Commissioners or the Department, as the case may be, may reasonably require for the exercise of their functions under this Act.

(5) The Treasury and the Chief Constable may disclose information to the Commissioners and the Department for the purpose of assisting the Commissioners or the Department, as the case may be, in the performance of their functions under this Act.

(6) The Commissioners and the Department may disclose information to the Treasury for the purpose of assisting the Treasury in the performance of their functions in relation to the collection of online gambling duty.

(7) The duties imposed and powers conferred by subsections (4) to (6) may be exercised despite any obligation not to disclose information which would otherwise apply.

## **12. Obligations of holder of licence**

- (1) The holder of a licence shall —

- (a) notify the Commissioners of any change in the beneficial ownership of more than 5 per cent. of the share capital, or of any class of share capital, in the holder;
  - (b) whenever required by the Commissioners, provide such information as the Commissioners may require to satisfy them that the holder of the licence continues to have adequate financial means available to conduct the online gambling authorised by the licence; and
  - (c) notify the Commissioners of any conviction of the holder of the licence, or of any designated official in relation to the licence, falling within section 13(3).
- (2) No person shall be appointed to be a director of the holder of a licence unless the Commissioners are satisfied that he is a person of integrity and have approved his appointment.
- (3) If subsection (1) or (2) is contravened the holder of a licence is guilty of an offence.

### **13. Cancellation etc. of licence**

- (1) The Commissioners shall cancel a licence where, after consultation with the Department, they are satisfied that the holder of the licence would not be eligible to be granted a licence on one or more of the grounds specified in section 4(2).
- (2) In the circumstances specified in subsections (3), (4) or (5) the Commissioners may by notice to the holder of a licence either —
- (a) suspend the licence for such period as may be specified in the notice, or until such conditions as are specified in the notice are complied with; or
  - (b) cancel the licence.
- (3) The Commissioners may act under subsection (2) where the holder of the licence, or any designated official in relation to the licence, is convicted —
- (a) by a court in the Island of any offence under the Casino Act 1986, the 1988 Act or this Act;
  - (b) by any court in the British Islands or the Republic of Ireland of an indictable offence; or
  - (c) by a court in any country or territory in the world of an offence punishable (in that country or territory) in the case of an adult by custody for an unlimited period or a term of 2 years or more.
- (4) The Commissioners may also act under subsection (2) where they are satisfied that the holder of the licence —
- (a) has failed to pay any sum due under section 5;



- (b) has failed without reasonable excuse to comply with any condition of the licence;
- (c) has contravened any provision of section 12 or of regulations;
- (d) has failed without reasonable excuse to comply with a direction under section 6(2)(c) or 15;
- (e) has failed to comply with any requirement of a relevant code of practice under section 17F (money-laundering codes) of the Criminal Justice Act 1991<sup>9</sup>; or
- (f) has ceased to conduct online gambling of any description authorised by the licence.

(5) The Commissioners may also act under subsection (2) where, in the circumstances mentioned in section 12(1)(b), the holder of a licence has failed to satisfy them that it continues to have adequate financial means available to conduct the online gambling authorised by the licence.

(6) Where the Commissioners give a direction under section 6(2)(c) or 15 they may also make an order suspending the licence until the direction is complied with.

(7) Where it appears to the Commissioners that any person has failed to comply with a requirement under section 16 in relation to any online gambling, they may also make an order suspending the licence authorising the conduct of that gambling until the requirement is complied with.

(8) An order under subsection (6) or (7) may be expressed to apply

—

- (a) with immediate effect, or
- (b) with effect from the expiration of such period as is specified in the order.

#### **14. Effect of cancellation etc. of licence**

(1) The cancellation or suspension of a licence does not affect any liability for anything done or omitted to be done before the date on which the cancellation or suspension takes effect.

(2) The liability of the holder of a licence to pay any fee or online gambling duty under section 5 continues during any period when the licence is suspended.

(3) Subject to subsections (1) and (2), where a licence is suspended under any provision of this Act, the licence is of no effect until the Commissioners by notice to the holder declare, or, where an appeal is brought under section 19, the High Court certifies, that the suspension has ceased.

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<sup>9</sup> 1991 c.25

**15. Control of management, advertising etc.**

- (1) Where it appears to the Commissioners that —
  - (a) any director of the holder of a licence, or
  - (b) any other person who exercises managerial functions with respect to the conduct of online gambling authorised by a licence,

is not a suitable person to act as a director of the holder of the licence, or to exercise such functions, they may by notice to the holder direct that the person be removed from his position as a director, or deprived of any such managerial functions, as the case may be.

(2) Even though a direction under subsection (1) has been complied with, it shall, unless it is withdrawn by a further notice to the holder of the licence, remain in force as a direction —

- (a) not to appoint the person to whom it relates as a director of the holder, and
- (b) not to allow him to exercise any managerial functions with respect to the conduct of online gambling authorised by the licence.

(3) The Commissioners may give to the holder of a licence such directions as to the information and other material which must, or must not, be included in —

- (a) any advertisement of online gambling;
- (b) any communication to the public, or to a participant or intended participant in online gambling,

as they consider appropriate for ensuring that online gambling is fairly and properly conducted.

(4) The Commissioners may approve and issue codes of practice with respect to the matters referred to in paragraphs (a) and (b) of subsection (3), and directions under that subsection may be framed by references to any such code of practice.

**16. Rights of entry, inspection etc.**

(1) For the purpose of exercising any function of the Commissioners under section 11 an authorised person may at any time —

- (a) enter any premises which he has reasonable cause to believe are or have been used for any purpose connected with the conduct of online gambling;
- (b) require any person to produce any documents or other records relating to or connected with the conduct of online gambling, and to take copies of such documents or records; and

- (c) require any person to provide him with access to any computer program used or to be used in connection with the conduct of online gambling.
- (2) An authorised person in exercise of the power conferred by subsection (1)(b) or (c) —
  - (a) is entitled at any reasonable time to have access to, and inspect and check the operation of, any computer and any associated apparatus or material which is or has been in used in connection with the records in question; and
  - (b) may require the person by whom or on whose behalf the computer is or has been used, or any person having charge of or otherwise concerned with the operation of the computer, apparatus or material, to afford him such assistance as he may reasonably require.
- (3) An authorised person exercising a power conferred by subsection (1) or (2) —
  - (a) shall, if asked to do so, produce some duly authenticated document showing his authority to do so;
  - (b) when entering any premises, may take with him such other persons and such equipment as may appear to him to be necessary.
- (4) Any person who —
  - (a) intentionally obstructs another in the exercise of any power conferred by this section, or
  - (b) fails without reasonable excuse to comply with a requirement under subsection (1)(b) or (c) or (2)(b), or
  - (c) refuses or neglects without reasonable excuse to provide any information or to produce or provide any document or other item when required to do so under this section; or
  - (d) in purported compliance with any requirement imposed on him under this section, provides, or causes or permits to be provided, any information which he knows to be false or misleading in a material particular or recklessly provides information which is false or misleading in a material particular; or
  - (e) produces or provides, or causes or permits to be produced or provided, any document or other item which he knows to be false or misleading in a material particular or recklessly produces or provides any document or other item which is false or misleading in a material particular,

is guilty of an offence.

- (5) If it is shown to the satisfaction of a justice of the peace on information on oath that there are reasonable grounds for entry of any premises for the purpose mentioned in subsection (1), the justice may by

warrant under his hand authorise an authorised person to enter and search the premises, using force if need be.

(6) A warrant issued under subsection (5) shall continue in force for 7 days.

(7) Nothing in this section shall compel the production of any communication which is subject to legal privilege.

(8) In this section "authorised person" means —

(a) a person authorised in writing by the Commissioners to exercise any power conferred by this section;

(b) a constable.

(9) If a person who has entered on any premises under this section, or has had access to any document, record or information produced or provided pursuant to any requirement under this section, discloses to another person information about any person or business thereby obtained by him, then, unless the disclosure is made in the course of the functions for the purposes of which he was authorised to enter the premises or was given access to the document, record or information, he is guilty of an offence.

## **17. Beneficial ownership**

(1) The High Court may, on the application of the Commissioners, make an order in respect of the company which is the holder of a licence requiring —

(a) any member of the company holding a share in the company;

(b) any director, manager, secretary or other officer of the company; or

(c) any person appearing to the Court to be interested in the share;

to disclose to the Commissioners the identity of the beneficial owner or owners of the share.

(2) If it appears to the High Court that default has been made in complying with an order under subsection (1) and that the identity of the beneficial owner or owners of the share in question has not been disclosed to the Commissioners, the Court may, on the application of the Commissioners, make an order vesting that share in the Treasury.

(3) The High Court may, in proceedings under subsection (2), summon any person to give evidence on oath as to any matter within his knowledge, and to produce any document in his custody or control, bearing upon the identity of the beneficial owner of the share in question.

(4) The High Court may, on the application of any interested person, revoke an order under subsection (2), and thereupon the share in question shall vest in the person in whom it would then have been vested apart from that order; but the court shall not revoke such an order unless it is satisfied that the identity of the person or persons who, on such revocation,

will be the beneficial owner or owners of the share in question has been disclosed to the Commissioners.

(5) In this section "beneficial owner", in relation to a share the beneficial ownership of which is vested in a body corporate (other than a quoted company), means an individual who, whether directly or indirectly, through the holding of, or interests in, a share or shares in that or another body corporate or other bodies corporate, is ultimately interested beneficially in the share in question.

## **18. Offences**

(1) A person convicted of an offence under this Act (except under section 16(4)) is liable —

- (a) on conviction on indictment, to custody for a term not exceeding 2 years or a fine, or both;
- (b) on summary conviction, to custody for a term not exceeding 6 months or a fine not exceeding £5,000, or both.

(2) A person convicted of an offence under section 16(4) is liable on summary conviction, to custody for a term not exceeding 6 months or a fine not exceeding £5,000, or both.

(3) Proceedings for an offence under this Act or regulations shall not be instituted except by or with the consent of the Attorney General.

(4) Where an offence under this Act or regulations committed by a body corporate is proved to have been committed with the consent or connivance of, or to have been attributable to any neglect on the part of, any director, manager, secretary or other similar officer of the body corporate or a person who was purporting to act in any such capacity, he as well as the body corporate is guilty of that offence and liable to be proceeded against and punished accordingly.

(5) Where the affairs of a body corporate are managed by its members, subsection (4) applies in relation to the acts and defaults of a member in connection with his functions of management as if he were a director of the body corporate.

(6) In relation to an offence under this Act, section 75(1) of the Summary Jurisdiction Act 1989<sup>10</sup> (time-limit for summary proceedings) applies with the substitution for "6 months" of "2 years".

## *Miscellaneous and supplemental*

## **19. Appeals**

(1) The holder of a licence may, not later than 21 days after the date on which it is notified in writing of it, appeal to the High Court against —

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<sup>10</sup> 1989 c.15

- (a) the refusal by the Department to renew the licence;
  - (b) any variation of a licence or of a condition of the licence (otherwise than at the request of the holder); or
  - (b) the suspension or cancellation of the licence under section 13.
- (2) On an appeal under subsection (1) the High Court may vary or reverse the decision of the Department or the Commissioners, as the case may be, if it considers that it or they —
- (a) erred in law; or
  - (b) based its or their decision on any incorrect material fact; or
  - (c) exercised its or their discretion in an unreasonable manner.

**20. Licences not to be assigned**

A licence shall not be capable of being assigned.

**21. Regulations**

- (1) The Department may by regulations —
- (a) prescribe anything which under this Act (except section 5) may be prescribed;
  - (b) prescribe the principles and rules in accordance with which online gambling of any description shall be conducted;
  - (c) require the rules of online gambling of any description (whether or not prescribed under paragraph (b)) to be notified in a prescribed manner to every participant in online gambling of that description;
  - (d) prescribe the manner in which the duties of any person engaged, appointed or seconded under section 11(2) are to be carried out, and the facilities to be granted to him for the purpose;
  - (e) regulate the fees which may be charged for participating in online gambling;
  - (f) require any individuals employed or engaged by or on behalf of the holder of a licence in the Island in the conduct of online gambling (except persons approved under section 10(1) or 12(2)) to be approved by the Commissioners;
  - (g) enable any participant by a notification to the holder of a licence to limit the stakes which he may make, or on the losses which he may incur, in any period in online gambling of any description;
  - (h) require a prescribed period to elapse between the notification and the coming into effect of any increase in any limit on stakes

or losses previously notified by any participant in online gambling of any description;

- (i) regulate the advertising of online gambling;
  - (j) require stakes, winnings and losses to be paid by means of credit accounts or in any other prescribed manner;
  - (k) require persons conducting online gambling to verify the identity and age of participants in a prescribed manner;
  - (l) (without prejudice to any obligation under the Data Protection Act 1986<sup>11</sup>) require prescribed steps to be taken to secure the privacy of participants in online gambling.
- (2) The Treasury may by regulations prescribe the manner in which the gross receipts of online gambling are to be accounted for, and the records to be kept, for the purposes of section 5(3).
- (3) Where online gambling of any description prescribed for the purpose of section 4(1) ceases to be so prescribed, it shall be treated as continuing to be so prescribed in relation to any licence already in force (including any such licence as from time to time renewed under section 8), but without prejudice to any variation under section 9(1).
- (4) Regulations may provide that a contravention of any provision of them shall be an offence on the part of any person of a description specified in the regulations, punishable on summary conviction by a penalty not exceeding that so specified (which shall not exceed custody for a term of 6 months or a fine of £5,000, or both).
- (5) Regulations shall be laid before Tynwald as soon as may be after they are made; and if Tynwald, at the sitting at which they are laid or the next following sitting, resolves that they be annulled, they shall cease to have effect.

## **22. Exemption from certain restrictions**

- (1) For the purpose of exempting online gambling from certain restrictions, the enactments specified in the Schedule are amended in accordance therewith.
- (2) A lottery is not unlawful if —
- (a) it is authorised by a licence, and
  - (b) it is conducted in accordance with the provisions of this Act and the terms of the licence.

## **23. Online gambling contracts to be enforceable at law**

No contract entered into in the course of online gambling shall be void or unenforceable by reason of section 40 of the 1988 Act.

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<sup>11</sup> 1986 c.31

**24. Notices**

Any notice to be given to the holder of a licence for any purpose of this Act or regulations, or of any provision of the licence, shall be deemed to be duly given if it is sent by ordinary post or delivered to —

- (a) such address in the Island of the holder as is specified for the purpose in the licence, or
- (b) such other address in the Island as the holder may from time to time notify for the purpose to the Commissioners.

**25. Interpretation: general**

In this Act —

"the 1988 Act" means the Gaming, Betting and Lotteries Act 1988;

"bet" does not include any bet made or stake hazarded in the course of, or incidentally to, a game of chance;

"the Commissioners" means the Isle of Man Gaming Control Commissioners;

"conduct", in relation to online gambling, has the meaning given by section 1(2);

"the Department" means the Department of Home Affairs;

"designated official" has the meaning given by section 10(2);

"game" includes a game played by one person by means of a computer or other device, even though no other person participates in the game;

"game of chance" does not include any athletic game or sport but, with that exception, includes a game of chance and skill combined and a pretended game of chance or of chance and skill combined;

"gaming" means the playing of a game of chance for winnings in money or money's worth, whether or not any person playing the game is at risk of losing any money or money's worth;

"licence" means a licence granted under section 4 or renewed under section 8;

"notice" means a notice in writing;

"online gambling" has the meaning given by section 1(1);

"prescribed" (except in section 5) means prescribed by regulations;

"regulations" means regulations made by the Department (or, in the case of regulations under section 5(2), by the Treasury) under or for the purposes of this Act;

"telecommunication" means a communication sent, transmitted or received by means of a telecommunication system;



"telecommunication system" has the same meaning as in the Telecommunications Act 1984<sup>12</sup>, but does not include a system the running of which falls or (if it were in the Island) would fall within section 4 (exemptions from licensing) of that Act.

**26. Short title**

This Act may be cited as the Online Gambling Regulation Act 2001.

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<sup>12</sup> 1984 c.11

# *Online Gambling Regulation Act 2001*

Section 22(1).

## SCHEDULE

### AMENDMENT OF ENACTMENTS

#### *The Pool Betting (Isle of Man) Act 1961 (XIX p.317)*

1. In section 5 after subsection (1) insert —

"(1A) Subsection (1) does not apply to the holder of a licence under the Online Gambling Regulation Act 2001 authorising the negotiating or receiving of bets made by way of pool betting who carries on a pool betting business in accordance with the provisions of that Act and the terms of the licence."

#### *The Casino Act 1986 (c.16)*

2. In section 18 (use of word "casino"), after subsection (1) insert —

"(1A) Nothing in subsection (1) applies to the use, in accordance with regulations under section 21 of the Online Gambling Regulation Act 2001, of the word "casino" in relation to the conduct of online gambling authorised by a licence under section 4 of that Act..".

#### *The Gaming, Betting and Lotteries Act 1988 (c.17)*

3. (1) In section 7 of the 1988 Act (advertisements relating to gaming), after subsection (4) insert —

"(4A) Subsection (1) does not apply to the advertisement, in accordance with regulations under section 21(1)(i) of the Online Gambling Regulation Act 2001, of online gambling within the meaning of that Act."

- (2) In section 8 (gaming), at the end insert "or

(c) the playing of a game authorised by a licence under the Online Gambling Regulation Act 2001 in accordance with the provisions of that Act and the terms of the licence."

- (3) In section 11(2) (use of premises for betting transactions), at the end insert

"(d) to betting transactions authorised by a licence under the Online Gambling Regulation Act 2001 and carried out in accordance with the provisions of that Act and the terms of the licence."

- (4) In section 14 (bookmaking), after subsection (1) insert —

"(1A) Nothing in subsection (1) applies to a person acting as bookmaker in relation to betting transactions referred to in section 11(2)(d)."

- (5) In section 23 (restriction on pool betting), for subsection (3) substitute —

"(3) Subsection (1) does not apply to —

(a) a registered pool promoter who carries on his pool betting business by post; or

(b) the holder of a licence under the Online Gambling Regulation Act 2001 authorising the receiving or negotiating of bets made by way of pool betting who carries on a pool betting business in accordance with the provisions of that Act and the terms of the licence."

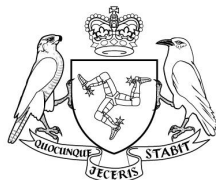
- (6) In section 26 (betting with minors), at the end insert —

"(4) In proceedings for an offence under subsection (1)(a) or (c) it shall be a defence for the accused to show that the betting transaction in question was effected by means of online gambling within the meaning of the Online Gambling Regulation Act 2001."

- (7) In section 29(2) (lotteries), after paragraph (aa) insert —

*Online Gambling Regulation Act 2001*

- "(ab) that the lottery to which the proceedings relate was authorised by a licence under the Online Gambling Regulation Act 2001, and that at the date of the alleged offence he believed, and had reasonable ground for believing, that it was being conducted in accordance with the provisions of that Act and the terms of the licence;"



## **ONLINE GAMBLING REGULATION ACT 2001**

### **ONLINE GAMBLING DUTY ORDER 2001**

*Approved by Tynwald*

*2001*

*Coming into operation*

*1 July 2001*

In exercise of the powers conferred on the Treasury by section 5 of the Online Gambling Regulation Act 2001<sup>(a)</sup>, and of all other powers enabling it in that behalf, the following Order is hereby made:-

#### **Citation, commencement and interpretation**

1. (1) This Order may be cited as the Online Gambling Duty Order 2001 and, subject to section 5(8) of the Act, shall come into operation on 1 July 2001.

(2) In this Order -

“the Act” means the Online Gambling Regulation Act 2001;

“gross gaming yield” has the same meaning as in section 5(4) of the Act;

“online gambling” has the same meaning as in section 1 of the Act; and

“period” means a calendar month, or such other period not exceeding five weeks as may be allowed in writing by the Collector.

#### **Rate of online gambling duty**

2. For the purposes of section 5(3) of the Act the prescribed proportion of the gross gaming yield is 2.5 per cent., provided that, in any case, the amount of duty in any period shall not be less than zero.

#### **Returns**

3. (1) Pursuant to section 5(3) of the Act, every person licensed under the Act shall furnish to the Collector a statement in the form in the Schedule to this Order for each period, or part thereof, that he is licensed.

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<sup>(a)</sup> 2001 c.10.

(2) The statement referred to in paragraph (1) shall be furnished to the Collector not later than the fifteenth day after the last day of the period to which it relates and shall contain full information on all matters for which the statement provides.

(3) Every person furnishing a statement in pursuance of this article shall complete and sign the declaration thereon and, subject to paragraph (4), shall send therewith to the Collector the amount of duty due.

(4) Every person from whom duty is due to be sent to the Collector pursuant to paragraph (3) may use an alternative method of payment if permitted to use that method in writing by the Collector.



## SCHEDULE

### Online Gambling Duty

### DUTY STATEMENT

**For the period from \_\_\_\_\_ to \_\_\_\_\_**  
*(These dates must not be altered without the agreement of Customs and Excise)*

Name of licensed operator
---------------------------

Period	
To reach Customs and Excise no later than	

Operator's reference number
-----------------------------

#### Particulars of gross gaming yield

	Figures may be given in sterling or euros	Official use only
Amount of all bets and stakes made or price of chances sold		
<i>Less</i> the value of all winnings and prizes due		
Gross gaming yield		
Duty payable		

	Figures may be given in sterling or euros
Amount of duty due for the period	
<i>Less</i> overpayments arising from previous statement(s)	
<i>Add</i> underpayments arising from previous statement(s)	
<b>TOTAL amount of duty to be paid</b>	
Type of currency used in this statement	Sterling / Euros <i>(delete as appropriate)</i>

**You must ensure that the completed statement and any duty payable are received no later than the due date by Customs and Excise, PO Box 6, Custom House, Douglas, Isle of Man, IM99 1AG**

#### DECLARATION BY SIGNATORY

I \_\_\_\_\_ (*full name in BLOCK LETTERS*) declare that the information given above is complete and correct and includes a full and true account of the gross gaming yield chargeable with online gambling duty under the Online Gambling Regulations Act 2001 for the period shown on this statement and of the duty due and payable on that gross gaming yield.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_ Status: \_\_\_\_\_

Remittance enclosed / payment made by credit transfer (*delete as appropriate*)

Note: payment of duty by credit transfer requires the prior permission of Customs and Excise

#### WARNING

**Failure to furnish a statement or pay the duty, making a declaration which is false, or the furnishing of a statement which is false in any material particular are offences, which may involve heavy penalties.**

Made this

day of

2001

Minister for the Treasury

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**EXPLANATORY NOTE**

*(This note is not part of the Order)*

This Order sets the rates of online gambling duty payable in respect of gross gaming yield of any online gambling conducted pursuant to a licence issued under the Online Gambling Regulation Act 2001.

The rate of duty shall be 2.5%.

The period for use in accounting for duty are prescribed by the Order as being either a calendar month, or any period not exceeding five weeks as may be allowed by Customs and Excise.

The Order also prescribes the form of the return (statement) required from licensed operators.

## ONLINE GAMBLING (LICENCE FEES) ORDER 2001

2001

*1 July 2001*

### Citation, commencement and interpretation

1. (1) This Order may be cited as the Online Gambling (Licence Fees) Order 2001 and shall come into operation on 1 July 2001.
- (2) In this Order, “the Act” means the Online Gambling Regulation Act 2001.

2. Pursuant to section 5(1) of the Act the fee payable to the Treasury on an application for the grant of a licence shall be £1000.

3. Pursuant to section 5(2) of the Act the annual licence fee payable to the Treasury by the holder of a licence shall be £80,000.

Made this                      day of                      2001

Minister for the Treasury

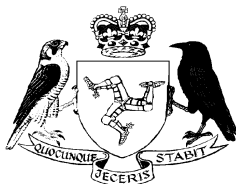
*(This note is not part of the Order)*

Section 5 of the Online Gambling Regulation Act 2001 provides for the Treasury to prescribe by order the fees payable in connection with the issue and renewal of licences under the Act, and the fees payable by persons making applications for licences.

This Order sets out the fees payable in such circumstances.

(a) 2001 c.10.





Statutory Document No. 296/01

## THE ONLINE GAMBLING REGULATION ACT 2001

### THE ONLINE GAMBLING (SYSTEMS VERIFICATION) REGULATIONS 2001

*Laid before Tynwald*

*19<sup>th</sup> June 2001*

*Coming into operation*

*21<sup>st</sup> June 2001*

In exercise of the powers conferred on the Department of Home Affairs by section 21 of the Online Gambling Regulation Act 2001<sup>1</sup>, and of all other enabling powers, the following Regulations are hereby made:—

#### **1. Citation, commencement and interpretation**

(1) These Regulations may be cited as the Online Gambling (Systems Verification) Regulations 2001 and shall come into operation on the 21<sup>st</sup> June 2001

(2) In these Regulations —

"the Act" means the Online Gambling Regulation Act 2001;

"the Commissioners" means the Isle of Man Gaming Control Commissioners;

"the Department" means the Department of Home Affairs;

"OGS" means a computer or system or systems of computers by means of which online gambling is conducted, and includes —

(a) all its associated components;

(b) its operating systems and applications software;

"the operator", in relation to any online gambling, means the person by whom it is conducted;

any reference to a game (for example, roulette or craps) includes a reference to an equivalent game played by means of a computer or other device.

## **2. Certification of OGS**

(1) The operator shall, before any online gambling is conducted by means of any OGS, produce to the Department a certificate in writing issued by a person approved for the purpose by the Department that the OGS by means of which it is conducted complies with the following standards specified in the Schedule.

- (2) The obligation under paragraph (1) arises —
- (a) on the grant of a licence to the operator; and
  - (b) on any alteration of the OGS.

## **3. Alteration of OGS**

The OGS by means of which any online gambling is conducted may not without the prior approval of the Commissioners be altered in any way which may affect its compliance with the requirements of the Schedule.

## **4. Penalties**

If any requirement of regulation 2 or 3 is contravened, each of the following —

- (a) the operator, and
- (b) the person who is the designated official in relation to the operator's licence,

is guilty of an offence and liable on summary conviction to a fine not exceeding £5,000.

SCHEDULE  
REQUIREMENTS WITH WHICH OGS MUST COMPLY

*General*

1. The OGS must —
  - (a) faithfully follow the game rules published by the operator; and
  - (b) provide over time no more than the expected house advantage to the operator.
2. Both the gaming and financial transactions software must be congruent and secure.

*Randomness*

3. The OGS must satisfy the following criteria for randomness, following Schneier —
  - (a) the data must be randomly generated, passing appropriate statistical tests of randomness (eg, Marsaglia's "Diehard" set of tests);
  - (b) the data must be unpredictable, ie. it must be computationally infeasible to predict what the next number will be, given complete knowledge of the algorithm or hardware generating the sequence, and all previously generated numbers;
  - (c) the series cannot reliably be reproduced, ie. if the sequence generator is activated again with the same input (as exactly as humanly possible) it will produce two completely unrelated random sequences.

*Fairness and information*

4. The outcome of any game, and the return to the player, must be independent of the CPU, memory, disk or other components used in the computer or other device used by the player.
5. The game outcome must not be affected by the effective bandwidth, link utilization, bit error rate or other characteristic of the communications channel between the OGS and the computer or other device used by the player.
6. The OGS must be able to display for each game the following information (ie. on the current page or on a page directly accessible from the current page via a hyperlink) —
  - (a) the name of game;
  - (b) restrictions on play;
  - (c) instructions on how to play, including a pay-table for all prizes and special features;
  - (d) the player's current account balance;
  - (e) unit and total bets permitted;
  - (f) the percentage return to the player, or supply sufficient information to enable a player to determine readily and easily the expected percentage return to him over a period of time, disregarding any exercise of skill by him;
  - (g) the rules of the game.

*Reporting requirements*

7. All financial reports produced by the OGS must be congruent with gaming transaction reports, and conversely. All such reports shall be freely available online to the Commissioners.

8. The OGS must —

- (a) be capable of producing monthly auditable and aggregate financial statements of gaming transactions, and
  - (b) calculate accurately all taxation and other monies due to the Treasury.
- 9. The OGS must maintain information about all games played, including —
  - (a) the identity of the player,
  - (b) the time the game began;
  - (c) the balance on the player's account at the start of the game;
  - (d) the stakes placed in the game (timestamped);
  - (e) the game status (in progress, complete, etc.); and
  - (f) the result of the game (timestamped).
  - (g) the time the game ended;
  - (h) amount won or lost by the player, and
  - (i) the balance on the player's account at the end of the game.
- 10. The OGS must maintain information about significant events as follows —
  - (a) large wins,
  - (b) transfers of funds in excess of such amount as the Commissioners may from time to time direct by notice in writing to the operator;
  - (c) changes made by the operator to game parameters.

MADE

2001

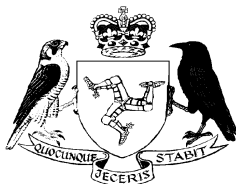
Minister for Home Affairs

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#### EXPLANATORY NOTE

*(This note is not part of the Regulations.)*

This Order which is made under the On-line Gambling Regulation Act 2001 provides for the rules to which an operator must comply in conducting on-line gambling and providing certification of software and the penalties for non compliance.



Statutory Document No.297/01

## THE ONLINE GAMBLING REGULATION ACT 2001

### THE ONLINE GAMBLING (REGISTRATION AND ACCOUNTS) REGULATIONS 2001

*Laid before Tynwald*

*19<sup>th</sup> June 2001*

*Coming into operation*

*21<sup>st</sup> June 2001*

In exercise of the powers conferred on the Department of Home Affairs by section 21 of the Online Gambling Regulation Act 2001<sup>1</sup>, and of all other enabling powers, the following Regulations are hereby made:—

#### **1. Citation, commencement and interpretation**

(1) These Regulations may be cited as the Online Gambling (Registration and Accounts) Regulations 2001 and shall come into operation on the 21<sup>st</sup> June 2001

(2) In these Regulations —

"the Act" means the Online Gambling Regulation Act 2001;

"the Commissioners" means the Isle of Man Gambling Control Commissioners;

"the operator", in relation to any online gambling, means the person by whom it is conducted;

"player", in relation to any online gambling, means any person participating in the online gambling, other than the operator or an employee or director of his.

#### **2. Registration and accounts**

(1) Subject to paragraph (2), no online gambling shall be carried on unless the player —

(a) is registered with the operator, and

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Price 80p Code A

<sup>1</sup> 2001 c.10

- (b) holds an account with the operator.
- (2) Paragraph (1) does not apply to online gambling consisting of a game where —
  - (a) no stake or bet is made in money or money's worth, and
  - (b) nothing in money or money's worth may be won or lost.

### **3. Rules for registration**

The following rules apply to registration under regulation 2(1)(a) —

1. No person may be registered except on an application for registration in such form, and containing such particulars, as may be approved by the Commissioners.
2. No person under the age of 18 may be registered.
3. Before an applicant for registration is registered, he must provide details of —
  - (i) his age;
  - (ii) his identity and
  - (iii) his place of residence.
4. The operator shall use his best endeavours to exclude from registration, and to cancel the registration of, problem gamblers.
5. The operator shall maintain a secure online list of all registrations (current or closed).

### **4. Rules as to accounts**

The rules set out in the Schedule apply to the opening and maintenance of accounts under regulation 2(1)(b).

### **5. Rules as to play**

The following rules apply to any online gambling —

1. The operator shall not accept any stake or bet from a player where, if it is lost in the course of play (either alone or in combination with any other stake or bet), the player's account would be overdrawn.
2. Before a player is permitted to begin a session of online gambling, the operator shall request and the player shall provide unique identifying information (such as a user name and password) previously notified to or supplied by the operator.

3. (1) The operator must provide the player with one of the following options for setting his maximum stakes or bets —
- (a) a maximum stake or bet, or maximum total stakes or bets, per session, or
  - (b) a maximum total stakes or bets in any period (not being less than 7 days).
- (2) A player shall not be permitted to increase any such maximum except after 7 days' notice.

## **6. Privacy**

- (1) An operator shall not disclose to any person —
- (a) any information obtained by him on the registration of or opening an account with a player;
  - (b) any information as to the state of a player's account.
- (2) Paragraph (1) does not apply where the disclosure is —
- (a) required by law, or
  - (b) made with the consent of the player.
- (3) Paragraph (1) is without prejudice to any requirements of the Data Protection Act 1986.

## **7. Penalties**

If any requirement of regulation 2 or 6, or any of the rules contained in these Regulations, is contravened, each of the following —

- (a) the operator, and
- (b) the person who is the designated official in relation to the operator's licence,

is guilty of an offence and liable on summary conviction to a fine not exceeding £5,000.

Regulation 4.

SCHEDULE  
RULES AS TO PLAYERS' ACCOUNTS

*Opening of account*

1. An account may not be opened except by means of a deposit of money —
  - (a) by credit or debit card, or
  - (b) by such other means as may be approved by the Commissioners.
2. The operator shall not encourage a player to hold more than one account.
3. Until the requirements of rule 5 are complied with, a player may not deposit sums exceeding in the aggregate such amount as the Commissioners may from time to time direct by notice in writing to the operator.

*Use of account*

4. Money deposited by a credit or debit card must not be available for online gambling until —
  - (a) the funds are received from the provider of the card account, or
  - (b) the provider issues an authorisation number to the operator indicating that the funds are guaranteed (in which case the number shall be maintained in a system audit log).

*Withdrawal from account*

5. The operator shall provide a player with a means of verifying his identity before any balance on his account may be withdrawn, consisting of —
  - (a) a personal identification number (PIN) sent to his place of residence as stated in his registration, or
  - (b) such other means as may be approved by the Commissioners.
6. A player shall not be permitted to make withdrawals from his account unless his identity has been positively verified in accordance with rule 5.
7.
  - (1) A player shall not be permitted to make withdrawals from his account except —
    - (a) to the card account or other financial facility from which the initial deposit was made, or
    - (b) if the operator of the card account or other facility will not accept it, by cheque sent to the player's place of residence as stated in his registration.
  - (2) Where a withdrawal from a player's account is made by cheque exceeding, or cheques exceeding in the aggregate, such amount as the Commissioners may from time to time direct by notice in writing to the operator, the operator shall carry out such additional verification procedures as the Commissioners may so direct.

*Statement of account*

8. A player must be able to access online a statement of his account containing —
  - (a) sufficient information to allow him to reconcile the statement against his own records to the session level; and
  - (b) details of major wins.

*Security of account*

9.
  - (1) Players' accounts must be secured against invalid access or update by methods approved in writing by the Commissioners.
  - (2) All deposits, withdrawals and other transactions must be maintained in a system audit log.
  - (3) A secure online list of all accounts (current or closed) must be maintained.



- (4) An inactive account in credit must be protected against forms of illicit access or removal.
- (5) All account transactions must be backed up so as to be capable of being recovered in case of system failure.
- (6) Personal data of a confidential nature, including the following —
  - (a) details of players' bank and other accounts;
  - (b) card numbers;
  - (c) card expiry dates;
  - (d) expected answers to any questions used to verify a player's identity (eg. mother's maiden name).

must only be stored in an encrypted or hashed form.

- (7) Personal information numbers (PINs) relating to —
  - (a) bank and other accounts;
  - (b) players' accounts.

must be stored using an irreversible encryption algorithm.

*Saving for money-laundering code*

10. These rules are without prejudice to the requirements of any applicable code of practice under section 17F (money-laundering codes) of the Criminal Justice Act 1991.

MADE

2001

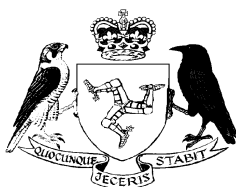
Minister for Home Affairs

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EXPLANATORY NOTE

*(This note is not part of the Regulations.)*

This Order which is made under the On-line Gambling Regulation Act 2001 provides for the rules and procedures that must be followed by the operator in registering new customer accounts. The Order also specifies detailed rules on the way accounts must be managed, privacy of information on account holders and the penalty for contravention.



Statutory Document No. 298/01

## THE ONLINE GAMBLING REGULATION ACT 2001

### THE ONLINE GAMBLING (ADVERTISING) REGULATIONS 2001

*Laid before Tynwald*

*19<sup>th</sup> June 2001*

*Coming into operation*

*21<sup>st</sup> June 2001*

In exercise of the powers conferred on the Department of Home Affairs by section 21 of the Online Gambling Regulation Act 2001<sup>1</sup>, and of all other enabling powers, the following Regulations are hereby made:—

#### **1. Citation, commencement and interpretation**

(1) These Regulations may be cited as the Online Gambling (Advertising) Regulations 2001 and shall come into operation on the 21<sup>st</sup> June 2001.

(2) In these Regulations —

"the Act" means the Online Gambling Regulation Act 2001;

"advertisement" includes every form of advertising or promotion, whether by means of the Internet, in a radio or television programme or message (whether broadcast or not), in a written or printed publication, by the display of notices, signs, labels or showcards, by means of circulars or other documents, or through any other medium.

"the Commissioners" means the Isle of Man Gambling Control Commissioners.

"hyperlink" includes an active icon;

"the operator", in relation to any online gambling, means the person by whom it is conducted;

"website" means an electronic communication or set of electronic communications which complies with the Hypertext Transfer Protocol and may be accessed and viewed in visible and legible form by any person having ordinary access to the global system of intercommunicating computers known as the Internet.

## **2. Requirement for Website**

(1) Every operator shall, in relation to any online gambling, maintain a website the front or home page of which contains the following —

- (a) its full name and the address of its registered office;
- (b) the number of the licence under which the online gambling is conducted;
- (c) the date on which the licence was originally granted;
- (d) a statement that the online gambling is regulated in the Isle of Man;
- (e) the coat of arms of the Isle of Man in a form approved by the Department of Home Affairs;
- (f) hyperlinks to the websites of the Isle of Man Government and Gamblers Anonymous;
- (g) one or more hyperlinks to a page or pages setting out —
  - (i) a summary of the arrangements for registration,
  - (ii) a statement that persons under the age of 18 are not permitted to register or to participate in online gambling; and
  - (iii) a statement that online gambling debts are enforceable in law in the Island.

(2) A statement under paragraph (1)(d) may in addition state that the online gambling is regulated in the British Isles, but shall not state or imply that it is regulated in the United Kingdom.

## **3. General requirements of advertising**

(1) Every advertisement of online gambling shall contain the URL of (or, in the case of an advertisement on a website, a hyperlink to) the website maintained under regulation 2.

(2) Every advertisement of online gambling shall comply with the following general requirements —

- (a) it shall not be indecent or offensive;
- (b) it shall be based on fact; and
- (c) it shall not be false, deceptive or misleading in any material particular.

(3) Without prejudice to paragraph (2), every advertisement of online gambling shall comply with the following requirements —

- (a) it shall not contain any statement as to the legality or otherwise of online gambling betting in any other jurisdiction;
- (b) it shall not be directed at any jurisdictions in which online gambling, or any kind of online gambling, is prohibited;
- (c) it shall not have any sexual content;
- (d) it shall not be directed at persons under 18;
- (e) it shall not contain any material in breach of copyright;
- (f) if it makes any claim as to the potential payout of a game, it shall contain sufficient information to enable a person to determine readily and easily the expected percentage return to him over a period of time, disregarding any exercise of skill by him.

#### **4. Enforcement**

(1) If it appears to the Commissioners that any advertisement of online gambling does not comply with regulation 2 or 3, they may direct the operator either -

- (a) to stop the advertisement being published or shown, or
- (b) to take such steps as they may specify to change the advertisement to comply with regulation 2 or 3, as the case may be.

(2) A direction under paragraph (1) shall be in writing and state the grounds on which it is given and the time within which it must be complied with.

#### **5. Penalties**

If any requirement of regulation 2 or 3 is contravened, or if a direction under regulation 4 is not complied with, each of the following —

- (a) the operator, and
- (b) the person who is the designated official in relation to the operator's licence,

is guilty of an offence and liable on summary conviction to a fine not exceeding £5,000.

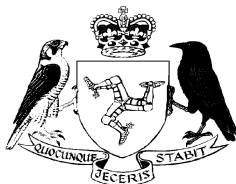
MADE

2001

EXPLANATORY NOTE

*(This note is not part of the Regulations.)*

This Order which is made under the On-line Gambling Regulation Act 2001 provides for the rules for advertising off and on a licensed website and what has to be provided on the site and what is prohibited. The Order also provides the Commissioners with powers of enforcement and penalties for non compliance.



Statutory Document No. 299/01

## THE ONLINE GAMBLING REGULATION ACT 2001

### THE ONLINE GAMBLING (PRESCRIBED DESCRIPTIONS) REGULATIONS 2001

*Laid before Tynwald*

*19<sup>th</sup> June 2001*

*Coming into operation*

*21<sup>st</sup> June 2001*

In exercise of the powers conferred on the Department of Home Affairs by sections 4(1) and 21 of the Online Gambling Regulation Act 2001<sup>1</sup>, and of all other enabling powers, the following Regulations are hereby made:—

#### **1. Citation and commencement**

These Regulations may be cited as the Online Gambling (Prescribed Descriptions) Regulations 2001 and shall come into operation on the 21<sup>st</sup> June 2001

#### **2. Prescribed descriptions of gambling**

(1) Any game, other than one specified in paragraph (2), is prescribed for the purpose of section 4(1)(a) and (b) of the Online Gambling Regulation Act 2001.

(2) The following games are excluded from paragraph (1) —

- (a) a lottery (other than bingo or keno);
- (b) any game involving a pool;
- (c) any game involving *pari-mutuel* or pool betting; and
- (d) any game involving spread betting.

MADE

2001

Minister for Home Affairs

#### EXPLANATORY NOTE

*(This note is not part of the Regulations.)*

This Order which is made under the On-line Gambling Regulation Act 2001 provides a list of games that are currently permitted under the Act. It is intended to permit additional games to be played as the regulatory function gains further experience in the regulation of on-line gambling.



**Department of Home Affairs**  
*Rheynn Cooishyn Sthie*

ONLINE GAMBLING REGULATION ACT 2001

**ONLINE GAMBLING LICENCE No.**

**THE DEPARTMENT OF HOME AFFAIRS** ("the Department") under the powers conferred upon it by section 4 of the Online Gambling Regulation Act 2001 hereby authorises ---

NAME ISLE OF MAN LIMITED

("the licensee") whose registered office is at ---

Address Isle of Man

and whose Parent Company is ----

NAME

incorporated in ---

Country

whose registered office, date of incorporation and registration number are ---

Address, Date, Number.

to carry on under the names of ---

Names

online gambling of the descriptions specified in Schedule 1, subject to the conditions specified in Schedule 2.

This licence is valid for a period of **5 years** and commences on Date

**WARNING**

**A BREACH OF ANY OF THE CONDITIONS OF THIS LICENCE MAY RESULT  
IN ITS SUSPENSION OR CANCELLATION**



## **SCHEDULE 1**

### **DESCRIPTIONS OF ONLINE GAMBLING PERMITTED BY THIS LICENCE**

1. The following casino games ---

To be listed once approved by the Gambling Control Commissioners

2. Bingo and Keno ---

To be listed once approved by the Gambling Control Commissioners

## **SCHEDULE 2**

### **CONDITIONS OF THIS LICENCE**

1. The licensee must secure that ---
  - (a) the games offered are demonstrably secure, reliable, and auditable;
  - (b) the games are not designed to give the player a false expectation of better odds by falsely representing any occurrence or event;
  - (c) the maximum expected house advantage associated with a particular game shall not exceed such factor as is specified by the Isle of Man Gambling Control Commissioners ("the Commissioners") and approved by the Department;
  - (d) the rules of the games are not unfair or misleading.
2. The licensee, having provided independent certification of the compliance of his OGS with the requirements of regulation 2 of the Online Gambling (Systems Verification) Regulations 2001 (SD 296/01), and complied with any additional testing as specified by and to the satisfaction of the Department, must seek approval for any changes made to the OGS and provide additional independent certification of its continued compliance with those Regulations.
3. The licensee must ---
  - (a) hold on deposit in an interest-bearing escrow account in a bank in the Isle of Man or with the agreement of the Department to make similar arrangements to guarantee £2 million for the duration of this licence;

## Online Gambling Licence

(b) instruct the bank that such sum shall be available to the Isle of Man Government to cover any outstanding debts of players if the licensee has ceased to operate under this licence, the balance being returned to the licensee; and

(c) furnish the Commissioners with confirmation by the bank of the above arrangements and subsequently quarterly bank statements.

Any arrangements must be made with an Isle of Man Insurance company under the laws of the Isle of Man.

The licensee may recover the interest on the sum of £2 million.

4. The licensee must establish a formal reserve for gaming, calculated according to the following formula or a form of reserve to be agreed by the Commissioners —

Roulette = 5,000 times the maximum stake permitted 'en plain'.

Blackjack = 100 times the maximum stake permitted per box.

Dice = 200 times the maximum stake permitted on a line bet.

Baccarat = 100 times the maximum stake.

Punto Banco = 100 times the maximum stake.

When more than one site is operated, the amount needed for a second site is taken as 25% of the amount needed for the first site; no further additional reserve need be held for additional sites.

Where more than one game is provided, the reserve required for each game shall be calculated. The game generating the largest required reserve should be taken as indicating the total reserve required and the other games ignored

The licensee must notify the Commissioners within 24 hours of drawing on the reserve, and must replenish such drawings on their instruction.

5. The licensee must not operate or be associated with online gambling sites not regulated by the Online Gambling Regulations Act 2001 except with the consent of the Commissioners and of the Department
6. The licensee shall permit all activities permitted by this licence and any associated transactions to be the subject of random audit on behalf of the Commissioners.

## Online Gambling Licence

7. The licensee shall not accept bets or stakes from any person in a country or territory in which it is illegal to place or accept such bets or stakes from within or outside that country or territory
8. Licence holders who also hold a Restricted Licence shall not accept bets or stakes under that Restricted licence from any person in a country or territory in which it is illegal to place or accept such bets or stakes from within or outside that country or territory
9. The licensee must if so requested by the Department take an active part in any forum or consultative body established by the Department relating to the operation and regulation of online gambling in the Isle of Man.
10. The licensee must commence online gambling pursuant to this licence within 9 months of the issue of this licence.
11. Name and Address of designated official(s) (must be endorsed on this licence before licensee operates an on-line casino):-
12. The licensee must comply with the requirement to pay duty, the Commissioners may cancel or suspend a licence on failure to comply with this requirement.
13. The licence holder must comply with the rules of registration of accounts in section 3 of the On-line Gambling (Registration of Accounts) Regulations 2001 and comply with the identification procedures of the anti money laundering code when the amount of a single transaction or aggregate in the case of a series of transactions on any customer account exceeds 3,000 ecu or a higher amount agreed by the Commissioners.
14. No general provision may be imposed by the licence holder to totally exclude residents of the Isle of Man from placing bets on Isle of Man on-line gambling sites is permitted except with the agreement of the Commissioners.
15. This licence is granted subject to compliance with IOMDHA006

Minister for Home Affairs

Date

### **WARNING**

**A BREACH OF ANY OF THE CONDITIONS OF THIS LICENCE MAY RESULT  
IN ITS SUSPENSION OR CANCELLATION**



# Isle of Man Government

*Reiltys Ellan Vannin*

## DEPARTMENT OF HOME AFFAIRS

### PROCEDURES TO BE COMPLETED BY FIRMS WHO HAVE BEEN SELECTED FOR ISSUE OF LICENCES

TASK	CONTACT	DATE REQUIRED
Supply a block diagram /flow chart to the Commissioners illustrating the way in which financial flows in respect of credit cards, merchant accounts, Isle of Man bank accounts, company and the players accounts are to be managed.	Derek Cannon  (To be copied to Peter Henderson)	Before licence comes into force.
Supply floppy disc and hard copy of proposed games, rules including proposed hold etc together with block diagram/flow charts as to the operation of the games. Note that for games to be accepted they must follow the rules of a legitimate jurisdiction— eg, Atlantic City, Australia, Nevada, United Kingdom.	Derek Cannon	Before licence comes into force.
Advise and seek the approval of the Department of Home Affairs for the arrangements made with an Isle of Man bank for a £2 million deposit or the way in which a £2 million insurance bond has been transacted.	W Greenhow	Before licence comes into force.
Supply a certificate of compliance satisfying the requirements of regulation 2 of SD 296/1—System Verification	W Greenhow	Before licence comes into force.
Arrange dates for demonstration of your Internet site to the officers and to the Commissioners	W Greenhow  (To include Gambling Inspectors and Customs and Excise Officers)	To officers as soon as possible; to the Commissioners after 20 September.

Agree with the Commissioners the appropriate gaming reserve based on the formula set out in the guide to the licence conditions.	Derek Cannon	Before licence comes into force.
Meet with Customs and Excise to:- Set up an account for payment of gambling duty with Isle of Man Customs; Discuss compliance with revenue trader agreement, put in place arrangements for access to premises and discuss money laundering requirements.	Peter Henderson, Customs and Excise	As soon as possible after September 20 but before licence comes into force.
Supply a statement from a firm of international accountants stating that probity and personal disclosure checks have been carried out on suppliers of any gambling software it is proposed to use.	W Greenhow  (Copy to Peter Henderson)	Prior end of September
Pay to the Department the licence fee of £80,000 by cheque made out to the Isle of Man government.	W Greenhow	19 September 2001
Agree with the Commissioners procedures for external security of and physical access to the servers located on the Isle of Man.	W Greenhow  (Copy to Peter Henderson) Will be a licence condition.	Before licence comes into force.
Seek the approval of the Commissioners of the designated official. (Appearance before the Commissioners will be required).	Derek Cannon	Appearance to be arranged for Thursday (pm) 27th of September.

Contact Numbers	Will Greenhow	+ 44 (0)1624 623355
	P Henderson	+ 44 (0) 1624 648132
	D Cannon	+ 44 (0) 1624 623355

Mr W. Greenhow

Issued 10<sup>th</sup> September 2001



# Isle of Man Government

*Reiltys Ellan Vannin*

## DEPARTMENT OF HOME AFFAIRS

### GUIDE TO CONDITIONS FOR AN ON-LINE GAMBLING LICENCE

#### 1. Conditions of licence

The Department may issue an online gambling licence:

- (1) on such conditions as the Department consider is necessary or desirable for the proper conduct of online gambling, and
- (2) on such other conditions as the Department considers necessary or desirable in the public interest.

#### 2. Form of licence

The licence shall provide for the inclusion of the following particulars and conditions:-

- (a) the licence holder's name and business address;
- (b) the date of issue of the licence;
- (c) the term for which the licence (subject to this Act) is to remain in force;
- (d) the financial arrangements required of the company;
- (e) the names of designated officials,
- (f) a statement as to system verification in accordance with SD 296/01,
- (g) the online games and other gambling activities specified by the licence, and
- (h) other matters in the public interest.

#### 3. Games

The conditions shall require that:

- (a) the holder only undertakes such activities as are prescribed in the Act and specified as a condition of holding his licence;
- (b) the games offered are demonstrably secure, reliable, and auditable;

- (c) the games must not be designed to give the player a false expectation of better odds by falsely representing any occurrence or event;
- (d) the maximum expected house advantage associated with a particular game shall be specified by the Commissioners and approved by the Department;
- (e) the rules of the games are not unfair or misleading.

#### **4. Financial arrangements**

- (a) The holder of a licence is required to hold on deposit in an interest-bearing escrow account in a bank in the Isle of Man or with the agreement of the Department to make similar arrangements to guarantee a sum not less than £2 million, to be determined by the Department, for the duration of the license period, and to instruct the bank that such sum shall be available to the Isle of Man government to cover any outstanding debts of players if the holder has ceased to operate under this Act, the balance being returned to the holder. The holder may recover the interest on the sum of £2 million, or such other sum as the Department has determined, at any time, and must provide quarterly bank statements to the Commissioners.
- (b) Each licence holder is required to establish a formal reserve for gaming which protects the site against a run of bad luck and therefore ensures that punters are paid out after a large win. And it provides comfort that the operator has adequate financial resources to carry on the business of online gaming to acceptable and proper standards and without imminent risk of closure or receivership. The reserve is to be calculated according to the following formula.

Roulette	=	5,000 times the maximum stake permitted 'en plain'.
Blackjack	=	100 times the maximum stake permitted per box.
Dice	=	200 times the maximum stake permitted on a line bet.
Baccarat	=	100 times the maximum stake.
Punto Banco	=	100 times the maximum stake.

When more than one site is operated, the amount needed for a second site is taken as 25% of the amount needed for the first site; no further additional reserve need be held for additional sites.

Where more than one game is provided, the reserve required for each game should be calculated. The game generating the largest required reserve should be taken as indicating the total reserve required and the other games ignored.

- (c) The holder may not to draw on the facility referred to in sub-section (b)

without notifying the Commissioners, and must replenish such drawings on their instruction.

## **5. System verification**

The holder shall provide when the licence is issued, or before the online gambling system (OGS) becomes operational, the certification to show that the OGS has been found, within the previous six months, to comply with the requirements of SD 296/01.

Changes to the OGS shall not be made without prior approval of the Commissioners and additional certification of compliance.

## **6. Audit**

The holder shall give an undertaking that he accepts outcomes and associated transactions of all games and other activities conducted under the Act shall be the subject of random audit on behalf of the Commissioners.

## **7. Display**

A licence when issued shall be displayed in the registered offices of the holder.

## **8. Non-compliance**

Failure to comply with these conditions without reasonable excuse shall cause the licence to be canceled or suspended by the Commissioners (section 13(4)(b) of the Act).

## **9. Membership of Regulatory Body**

Every licence holders be shall members of a specially formed body known as the “Isle of Man On-line Gambling Forum, a Chairman of which will be appointed by the Department, any costs of running the Forum will be funded equally between the licence holders.



**10. Jurisdiction from where bets are prohibited**

Licence holders are responsible for ensuring bets are not accepted from citizens placing bets from jurisdictions where it is illegal for such citizens to place bets.

**11. Contravention of licence conditions**

If any of the conditions of a licence are contravened the holder is guilty of an offence.

**Issued on the 7<sup>th</sup> June 2001 by the Department of Home Affairs,**  
**Homefield, 88 Woodbourne Road, Douglas, Isle of Man. IM2 3AP British Isles.**  
**Tel +44 (0) 1624 623355 Fax +44 (0) 1624 621298**  
**e-mail will.greenhow@dha.gov.im Web Site www.gov.im**



# Isle of Man Government

*Reiltys Ellan Vannin*

## VAT ON ONLINE GAMBLING

In response to enquires made to the Department of Home Affairs in the matter of the possible liability of online gaming to VAT Treasury see the position as follows:-

Customs and Excise can confirm that it was never the intention of the Treasury that online gaming should be subject to VAT.

The Treasury interprets European Union and Island VAT legislation to mean that online gaming with the operators licensed by the Department of Home Affairs is not liable to VAT. Such gaming would qualify under Item 1, Group 4 of Schedule 10 to the Value Added Tax Act 1996, and therefore any supplies would be exempt. Customs and Excise does not interpret the provisions of Note (1) of Group 4, which deals with exceptions to Item 1, as meaning that online gaming should be standard-rated.

Therefore, unless proved to the contrary and subject to future legislative changes, the Treasury will not seek to recover VAT on betting, wagering or the playing of any games of chance involved in online gaming by the licensed operators using games authorised by the Gambling Control Commissioners.

It should be noted that in other circumstances, for example the provision of hardware, such as the siting of a terminal in a club or public house for the purposes of taking part in online gaming could be caught by the provisions governing VAT on the takings of gaming machines other than in licensed casinos. Any such variation or proposed change to operating procedures should be discussed with Customs and Excise Division's Advice Centre staff (01624-648116) in advance.

Operators should also note that, if they make only exempt supplies, they will not be entitled to recovery of input tax.

### PLEASE NOTE

**IT IS THE RESPONSIBILITY OF APPLICANTS FOR LICENCES AND LICENCE HOLDERS TO OBTAIN THEIR OWN LEGAL ADVICE ON THE APPLICATION OF THE LAW IN THE ISLE OF MAN TO ON-LINE GAMBLING.**

Issued 16<sup>th</sup> November 2001



# Isle of Man Government

*Reiltys Ellan Vannin*

## DEPARTMENT OF HOME AFFAIRS

### PERSONAL DECLARATION FORM RELATING TO AN APPLICATION FOR A LICENCE UNDER THE ONLINE GAMBLING REGULATION ACT 2001.

Name	
------	--

(please give name of the company making the application)

Completed forms must accompany any formal application to the Department and should be typed or completed in block capitals in black ink.

**NOTES:** - A Personal Declaration Form must be completed by each person who:-

- (a) is a director or secretary of an applicant company or of any parent company;
- (b) is the holder of (or is an officer of an organisation which holds) more than 5% of the issued share capital of an applicant company or of any parent company;
- (c) is providing, or will provide, financial backing for the management of the business involved,
- (d) is, or will be, in actual and effective control of the business;
- (e) is, or will be, in actual and effective control of gambling on the site;
- (f) is appointed as a director or secretary of a company (or any parent of a company) which currently holds an online gambling licence from the Department;
- (g) acquires (or is an officer of an organisation which acquires) more than 5% of the issued share capital of a company (or any parent of a company) which currently holds a valid licence from the Department; or
- (h) is otherwise requested to do so by the Department.

Under section 4(2)(a) and (b) of the Online Gambling Regulation Act 2001 the Department must satisfy itself that the company is controlled by persons of integrity, and managed by persons of competence and integrity. Accordingly the Department will seek information from the police about the person completing this declaration including details of any convictions he or she may have had in the Isle of Man or the United Kingdom.

**Any such conviction (including traffic offences) and juvenile findings of guilt should be declared in full on this form. By virtue of the Rehabilitation of Offenders Act 2001 (exceptions) Order 2001, spent convictions, as defined in the Rehabilitation of Offenders Act 2001, must be disclosed. Applicants must also declare details of any convictions or finding of guilt by any court outside the British Islands.**

*Please complete in black ink using typescript or BLOCK LETTERS except when signing.*

## Personal Details

[illegible]

<b>4d. Status</b> (Tick one box only)		* Please give details of former spouse in 6			
Married	Single	*Separated	* Divorced	* Widowed	* De facto relationship
<b>5a. Passport details: Number:</b>					
<b>5b. Where issued:</b>			<b>When issued:</b>		
<b>6 Details of spouse/defacto partner</b>					
<b>6a. Date of marriage</b> (if applicable):	Day	Month	Year		
<b>6b. Place of marriage:</b>					
<b>6c. Name of spouse or partner:</b> (including maiden name if applicable)					
<b>6d. Date of birth of spouse or partner:</b>					
<b>6e. Employer of spouse or partner</b>					
<b>7. Give full names including maiden names, dates of birth of :-</b>					
Mother:			Date of Birth:		
Father:			Date of Birth:		
<b>8. Address of parents:</b>					
Mother:			Father:		
Post Code:			Post Code:		
<b>9. Brothers, sisters and dependants: (please give full names, dates of birth, addresses and relationships):</b>					
Full name:	Date of Birth:	Address:			
Relationship:		Post Code			
Full name:	Date of Birth:	Address:			
		Post Code			
Full name:	Date of Birth:	Address:			
Relationship:		Post Code			
Full name:	Date of Birth:	Address:			
Relationship:		Post Code			

Full name:	Date of Birth:	Address:	
Relationship:		Post Code	
Full name:	Date of Birth:	Address:	
Relationship:		Post Code	
<b>10.</b> Are you currently a director or secretary of any company, or a member of any partnership or consortium in the Isle of Man, the United Kingdom or abroad, other than the one in connection with which this declaration is being made?			
Yes		No	
<b>If yes,</b> please list the companies, firms, partnerships, and consortia, giving the name and address of each, and the nature of the business it carries on. Please also give the place and date of incorporation and state whether you are a director or secretary. In the case of partnerships, the names and dates of birth of your partners should be shown.			
Continue on a separate sheet if necessary:-			
<b>10a.</b> Company Name:		Nature of business:	
Address:			
Post Code:			
Place and date of incorporation and registration number :			
Place:	Date:	Registration number:	
<b>10b.</b> Business partners' full names and date of birth:			
Name:		Date of Birth:	
Address:			
Post Code:			
Name:		Date of Birth:	
Address:			
Post Code:			
<b>11.</b> Have you ever been a director or secretary of a company, or a member of a partnership or consortium in the Isle of Man, the United Kingdom or abroad other than those listed in reply to question above 10?			
Yes		No	
<b>If yes,</b> please list the companies, firms, partnerships, and consortia, whether or not they are still trading. In the case of companies, please state whether you were a director or secretary, and in the case of partnerships, the names and dates of birth of the persons who were your partners should be shown relative to each partnership.			
Continue on a separate sheet if necessary.			
<b>11a.</b> Company name		Director	Secretary
Place and date of incorporation and registration number :			





<b>15a.</b> Please give details of your profession or occupation over the past 10 years, giving the names and addresses of all employees In the Isle of Man, United Kingdom or abroad during this period, and the nature and dates of employment.			
<b>Name and Address and post code of employers:</b>		<b>Nature of employment:</b>	<b>Dates of employment:</b>
Do you intend to continue with your present employment if this application is granted?			
Yes		No	
<b>15b.</b> Are you a member of any professional body which may have any regulatory role over the activities of its members?			
Yes		No	
Name, address and post code of body concerned:			
<b>16.</b> Are you acting wholly or partly as nominee or agent for, or trustee of, any other person or company?			
Yes		No	
<b>If yes, please give details below:</b>			
Name:		Date of Birth:	
Address:		Nature of relationship/arrangement:	
Post code:			
<b>17.</b> Have you any financial interest in the business in connection with which this declaration is being made?			
Yes		No	
<b>If yes, please give details below:</b>			
<b>Financial Holding</b>	<b>% holding</b>	<b>Class or description of class (where applicable)</b>	<b>Source of funds for this holding</b>

<b>18. Will you be an active participant in the management or operation of the proposed business?</b>	
Yes	No
<b>If yes, please give full details below.</b>	
<b>19. Please explain how you intend to finance your investment in the proposed business with appropriate cross reference to your answers to questions 20, 21 and 22 below.</b>	
<b>20. Have you made any arrangements for persons, firms or companies to advance money, or other equity to you to assist in financing your investment in the proposed business?</b>	
Yes	No
<b>If yes, please give full details of the names and addresses of such persons, firms or companies, and explain how the money or equity will be secured. Please also give details of the method of repayment and the interest rates agreed.</b>	
<b>21. Please give a separate statement of your assets and liabilities.</b>	
A pro-forma is attached at annex A. Documentary evidence should be provided to substantiate all material items and the qualifications of the reporting accountant should be stated.	
Total Assets:	Total Liabilities:
<b>22. If there is any further information relating to your finance which should be taken into account, please give details below:</b>	

<b>23. Have you ever been charged or summonsed for any offence, including road traffic offences, and subsequently been convicted, or accepted a formal caution in the Isle of Man, Great Britain, or elsewhere?</b>	
Yes	No
<b>If yes, please give details below:</b>	
All findings of guilt (including traffic offences) formal cautions and juvenile findings of guilt <b>must</b> be declared, however long ago the offences occurred and whether or not they have previously been declared to the Department. By virtue of the Rehabilitation of Offenders Act 2001 (Exceptions) Order 2001 all spent convictions as defined in the Act must also be disclosed	
Court and date	Offence and penalty
<b>24. Have you any reason to believe that any prosecution against you might be pending?</b>	
Yes	No
<b>If yes, please give full details below:</b>	
I hereby give permission for a police check to be carried out.	
Signature _____ Date _____	
<div style="border: 1px solid black; padding: 5px; display: inline-block;">           For Official use only            Police check completed  <input type="checkbox"/> </div>	
<b>25. Has your husband/wife/defacto partner ever been charged or summonsed for any offence?</b>	
Yes	No
<b>If yes, please give full details below:</b>	
Court and date	Offence and penalty

<b>26. Have you or your husband/wife/defacto partner ever been adjudged bankrupt or the subject of a Bankruptcy petition?</b>	
Yes	No
<b>If yes, please give full details below:</b>	
<b>27a. Were any of the entities named in replies to questions 10, 11 or 12 authorised under either the Financial Supervision Act 1988, the Investment Business Acts 1991 to 1993, the Banking Act 1998, the Corporate Service Providers Act 2000, the Building Societies Act 1986 (or similar legislation abroad) to conduct investment business.</b>	
Yes	No
<b>If yes, please give details and the name and address of the Regulatory Authority.</b>	
Name:	Address:
<b>27b. Have you or any company or partnership declared at 10, 11, 12 or 15 ever applied to any governmental or statutory body, police force or court in the Isle of Man, United Kingdom or abroad for any licence or authority connected with the provision of gaming or betting activities or the sale of alcohol?</b>	
Yes	No
<b>If yes, identify the subject of the application.</b>	
Please give full details below including name and address of statutory body or court, nature, date and reference number of the application and the result.	
Statutory body/court:	Date:
Address:	
Post code:	



**29.** Please give the full names, dates of birth and addresses of 3 referees. These should be responsible people to whom you are well known (but not related) and should **not** be connected with the business for which you are making this application. (ie they should not be solicitors or accountants working on behalf of the applicant).

**29a.** Name:

Date of birth:

Address:

Post Code:

Official use only  
Reference received

☐

Telephone number      Home:  
                                    Business:  
                                    Fax Number:  
                                    Mobile Number:  
                                    E-mail address:  
                                    Web Site address if any:

**29b.** Name:

Date of birth:

Address:

Post Code:

Official use only  
Reference received

☐

Telephone number      Home:  
                                    Business:  
                                    Fax Number:  
                                    Mobile Number:  
                                    E-mail address:  
                                    Web Site address if any:

**29c.** Name:

Date of birth:

Address:

Post Code:

Official use only  
Reference received

☐

Telephone number      Home:  
                                    Business:  
                                    Fax Number:  
                                    Mobile Number:  
                                    E-mail address:  
                                    Web Site address if any:

**30.** Have you been associated in any way with any other application to the Department or the Isle of Man Gaming Control Commissioners?

Yes

No

**If yes,** please give details, including the Department's or the Commissioners' reference number.

**31.** If there is any further information which you wish to provide in support of your application, please give details here.

**32.** As well as a copy of your birth certificate and passport 3 copies of a recent photograph should be attached to this form. The photos should be passport size, and signed and dated one copy of the photograph must be endorsed on the back with the words "I certify that this is a true likeness of....." and signed by a British Subject resident in the British Islands who has known you personally for at least two years.

State who signed your photograph and his/her address:-

Official use only

Three 3 Photographs  
received.

Endorsed photograph  
received.

Copy of Birth certificate  
received.

Copy of  
Passport received.

**I certify that to the best of my knowledge and belief, the information I have given in this declaration is correct and the accompanying signed photographs are a recent likeness of myself.**

Signature _____	Date _____
<b>33. Applicants are warned that the discovery of any material falsification or omission of information required may result in the Department's refusal to grant or revoke a licence. Where false particulars are discovered subsequent to the issue of a licence, the Department are empowered to revoke it. Pending a decision by the Department, all changes affecting any of the information given in this application must be notified to the Department without delay.</b>	
<b>PLEASE TURN OVER FOR AUTHORISATION TO BANKS</b>	
<b>IMPORTANT NOTE:</b> It should be noted that this form does not constitute an application for a work permit to be issued under the provisions of the Control of Employment Act 1975. <b>Completed Forms should be returned to the Administrator, Department of Home Affairs, Homefield, 88 Woodbourne Road, Douglas, Isle of Man. IM2 3AP British Isles.</b> Telephone +44 (0) 1624 623355 Fax +44 (0) 1624 621298	
For official use	
Declaration Received	Checks successfully completed
	Official notified

**Issued on the 7<sup>th</sup> June 2001 by the Department of Home Affairs,**

**Homefield, 88 Woodbourne Road, Douglas, Isle of Man. IM2 3AP British Isles.**

**Tel +44 (0) 1624 623355 Fax +44 (0) 1624 621298**

**e-mail will.greenhow@dha.gov.im Web Site www.gov.im**

Annex (A)

## AUTHORISATION

I/We hereby authorise you to provide the Department of Home Affairs, Isle of Man Government, with whatever information they may request regarding the following accounts and to obtain references from you.

Bank, address and post code	Account name and number
Signed:	Date:
Signed:	Date:



**Note:** If any account is a joint account, or otherwise requires more than one signature, **all** relevant persons must sign.

**STATEMENT OF ASSETS  
AND LIABILITIES AS AT:-**

**£**

**£**

ASSETS	X	
CASH IN HAND	X	
BANK ACCOUNTS	X	
BUILDING SOCIETY ACCOUNTS	X	
OTHER ACCOUNTS (eg stockbrokers, solicitors)	X	
	X	
STOCKS AND SHARES	X	
LIFE ASSURANCE POLICIES	X	
OTHER (eg Unit/Investment Trusts, PEP's)	X	X
PROPERTY - MAIN RESIDENCE	X	
OTHER LAND OR PROPERTY	X	
MOTOR VEHICLES, etc	X	
JEWELLERY/ANTIQUES/ART	X	
OTHER (Please specify)		
BUSINESS INTERESTS (please provide name and address of business, nature of interest and basis of valuation)		X
TOTAL ASSETS		X
—		
<b>LIABILITIES</b>		X
MORTGAGES (please provide name of lender and details)	15	X
OTHER LOANS/BANK OVERDRAFTS		X

**I certify that to the best of my knowledge and belief this is a complete and accurate statement of my personal assets and liabilities as at**

**Signed**

**Date**

**I confirm that, having reviewed the information and records provided by the above, in my/our opinion the assets and liabilities are fairly stated.**

**Signed**

**(Reporting Accountant)**

**Date**



## **ANTI-MONEY LAUNDERING (ONLINE GAMBLING) CODE 2002**

### **ARRANGEMENT OF PARAGRAPHS**

1. Citation and commencement
2. Interpretation
3. General requirements

### **IDENTIFICATION PROCEDURES**

4. Identity of prospective participants
5. Evidence of identity
6. Changes in patterns of transactions

### **RECORD KEEPING**

7. Identity
8. Records of transactions
9. Retention of records
10. Format and retrieval of records
11. Register of money laundering enquiries and reports

### **INTERNAL PROCEDURES**

12. Recognition and reporting of suspicious transactions

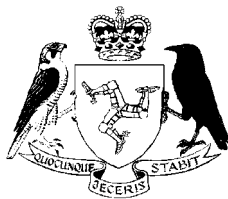
### **EDUCATION AND TRAINING**

13. Staff training
14. Training for senior and specialist staff
15. Refresher training

### **GENERAL**

16. Bodies corporate.
17. Defence.
18. Guidance notes.
19. Amendment.

Price £1.60 Price Code B



## CRIMINAL JUSTICE ACT 1990

### ANTI-MONEY LAUNDERING (ONLINE GAMBLING) CODE 2002

*Laid before Tynwald: 15<sup>th</sup> October 2002*

*Coming into operation: 26<sup>th</sup> September 2002*

In exercise of the powers conferred on the Department of Home Affairs by section 17F of the Criminal Justice Act 1990<sup>(a)</sup>, and all other enabling powers, the following Code is hereby made:-

#### **Citation and commencement**

1. This Code may be cited as the **Anti-Money Laundering (Online Gambling) Code 2002** and shall come into operation on the 26<sup>th</sup> September 2002.

#### **Interpretation**

2. In this Code -

*“the anti-money laundering requirements”* means -

- (a) sections 45 to 49 of the Drug Trafficking Act 1996<sup>(b)</sup>,
- (b) sections 17A to 17D of the Criminal Justice Act 1990<sup>(c)</sup>;
- (c) section 9 of the Prevention of Terrorism Act 1990<sup>(d)</sup>; and
- (d) this Code,

and includes, in the case of anything done otherwise than in the

---

<sup>(a)</sup> 1990 c.1; s. 17F inserted by Sch. 2 of 1998 c.8.    <sup>(b)</sup> 1996 c.3    <sup>(c)</sup> 1990 c.1    <sup>(d)</sup> 1990 c.19

Island, anything which would constitute an offence under the provisions specified in paragraphs (a) to (c) if done in the Island;

“**online gambling**” means **online gambling** within the meaning given in section 1(1) of the Online Gambling Regulation Act 2001;

“**participant**” means any person participating in **online gambling** other than as a person conducting **online gambling**;

“**payment**” means a payment in money or money’s worth, but does not include the credit of winnings to an account operated by the **relevant person** for the benefit of the **participant** to whom the winnings are payable;

“**relevant person**” means a person conducting **online gambling** in accordance with a licence granted under section 4 of the Online Gambling Regulation Act 2001;

“**transaction**” includes –

- (a) **payments** made by a **participant** to a **relevant person**;
- (b) **payments** made by a **relevant person** to a **participant**;
- (c) participation in **online gambling**

### **General requirements**

- 3. (1) In conducting **online gambling** a **relevant person** shall -
  - (a) maintain –
    - (i) identification procedures in accordance with paragraphs 4 to 6;
    - (ii) record keeping procedures in accordance with paragraphs 7 to 11;
    - (iii) internal reporting procedures in accordance with paragraph 12; and
    - (iv) internal controls and communication procedures which are appropriate for the purposes of forestalling and preventing money laundering;
  - (b) take appropriate measures from time to time for the purpose of making employees aware of –
    - (i) the procedures maintained under head (a); and

- (ii) the provisions of *the anti-money laundering requirements*; and
- (c) provide training for employees to assist them –
  - (i) in the recognition and handling of *transactions* carried out by or on behalf of, any person who is, or appears to be, engaged in money laundering;
  - (ii) in dealing with *participants* where such *transactions* occur; and
  - (iii) in procedures to be adopted where *transactions* have been reported to the appropriate law enforcement authorities in accordance with *the anti-money laundering requirements*.

(2) Any person who contravenes sub-paragraph (1) shall be guilty of an offence and liable -

- (a) on summary conviction to a fine not exceeding £5,000 or to custody not exceeding 6 months, or to both;
- (b) on conviction on information to custody not exceeding 2 years or to a fine, or to both.

## **IDENTIFICATION PROCEDURES**

### **Identity of prospective participants**

4. (1) A *relevant person* shall establish and maintain procedures which require the prospective *participant* to provide satisfactory information as to his identity (either online or in writing) as soon as reasonably practicable after contact is first made between them.

(2) Procedures comply with this paragraph if they require that unless satisfactory information as to the prospective *participant*'s identity is provided –

- (a) no account will be opened for him,
- (b) no money will be accepted from him, and
- (c) no participation in *online gambling* by him will be permitted.

### **Evidence of identity**

5. (1) This paragraph applies in respect of the first occasion on which a

***qualifying payment*** is to be made to a ***participant***.

(2) A ***relevant person*** shall establish and maintain procedures which require the ***participant*** to produce satisfactory evidence of his identity before making the ***qualifying payment***.

(3) A ***payment*** is a ***qualifying payment*** if –

- (a) the ***payment*** exceeds Euro 3,000; or
- (b) when taken with all other ***payments*** made to the ***participant*** within the 30 days immediately preceeding the date on which the ***payment*** is to be made, the aggregate amount exceeds Euro 3,000.

(4) Procedures comply with this paragraph if they require that if satisfactory evidence is not produced –

- (a) the ***qualifying payment*** will not be made unless that evidence is produced and
- (b) no further participation in ***online gambling*** by the ***participant*** will be permitted.

#### **Changes in patterns of transactions**

6. (1) This paragraph applies where ***transactions*** are undertaken by a ***participant*** which are significantly different (in number or value) to the normal pattern of previous ***transactions*** undertaken by him.

(2) A ***relevant person*** shall establish and maintain procedures which, as soon as reasonably practicable after the variation in the pattern of transactions, –

- (a) require satisfactory confirmation of the information as to identity provided under paragraph 4; and
- (b) in cases in which evidence of identity has been produced under paragraph 5, require satisfactory verification of the evidence of identity produced under that paragraph.

(3) Procedures comply with this paragraph if they require that –

- (a) when satisfactory confirmation of the information as to the ***participant's*** identity is not provided; or
- (b) when satisfactory verification of the evidence of the ***participant's*** identity is not provided,

no further participation in ***online gambling*** by him will be permitted.



## RECORD KEEPING

### **Identity**

7. (1) Where a ***relevant person*** is required under this Code to obtain information as to the identity of a person or confirm such information, the ***relevant person*** shall establish and maintain a record in the Island which –

- (a) indicates the nature of the information obtained; and
- (b) comprises a copy of the information.

(2) Where a ***relevant person*** is required under this Code to obtain evidence of the identity of a person or to verify that evidence, the ***relevant person*** shall establish and maintain a record in the Island which –

- (a) indicates the nature of the evidence obtained; and
- (b) comprises either a copy of the evidence or, where this is not reasonably practicable contains such information as would enable a copy of the evidence to be obtained.

### **Records of transactions**

8. The ***relevant person*** shall maintain a record of all ***transactions*** carried out by or on behalf of ***participants*** (for example, records sufficient to identify the source and recipient of payments from which investigating authorities will be able to compile an audit trail for suspected money laundering).

### **Retention of records**

9. (1) A ***relevant person*** shall maintain the records required by Paragraph 7 for at least 6 years from the date when –
- (a) the person concerned formally ceases to be a ***participant***; or
  - (b) if head (a) does not apply, when the last ***transaction*** was carried out by the former ***participant***.
- (2) A ***relevant person*** shall maintain the records required by Paragraph 8 for at least 6 years from the date of the ***transaction***.
- (3) Where a report has been made to a constable under Paragraph 12 (f), or the person knows or believes that a matter is under investigation, that person shall, without prejudice to sub-paragraph (1), retain all relevant

records for as long as required by the constable.

#### **Format and retrieval of records**

10. (1) A *relevant person* shall ensure that any records required to be maintained under this Code are capable of retrieval without undue delay.
- (2) A *relevant person* may rely on the records of a third party in respect of the details of *transactions*, provided that the *relevant person* is satisfied that the third party is willing and able to retain (in accordance with Paragraph 9) and, if asked, to produce copies of the records required.

#### **Register of money laundering enquiries and reports**

11. (1) A *relevant person* shall maintain, in the Island –
  - (a) a register of all enquiries made of it by law enforcement or other authorities acting under powers provided by *the anti-money laundering requirements*;
  - (b) a register of all reports made to a constable in pursuance of Paragraph 12(f).
- (2) The registers maintained under sub-paragraph (1) shall be kept separate from other records and –
  - (a) the register maintained under sub-paragraph (1)(a) shall contain as a minimum the date and nature of the enquiry, the name and agency of the inquiring officer, the powers being exercised, and details of the *participants* or *transactions* involved; and
  - (b) the register maintained under sub-paragraph (1)(b) shall contain details of the date on which the report is made, the person who makes the report, the constable to whom it is made and information sufficient to identify the relevant papers.

### **INTERNAL PROCEDURES**

#### **Recognition and reporting of suspicious transactions**

12. A *relevant person* shall establish written internal reporting procedures which,

in relation to his ***online gambling*** business, will -

- (a) enable all its directors or all other persons involved in its management, and all appropriate employees to know to whom they should report any knowledge or suspicions of money laundering activity;
- (b) ensure that there is a clear reporting chain under which those suspicions will be passed to the appropriate person;
- (c) identify an appropriate person ( in this paragraph referred to as “the appropriate person”) to whom a report is to be made of any information or other matter which comes to the attention of the person handling that business and which in that person’s opinion gives rise to a knowledge or suspicion that another person is engaged in money laundering;
- (d) require the appropriate person to consider any report in the light of all other relevant information available to him for the purpose of determining whether or not it gives rise to a knowledge or suspicion of money laundering;
- (e) ensure that the appropriate person has reasonable access to any other information which may be of assistance to him and which is available to the ***relevant person***; and
- (f) require that the information or other matter contained in a report is disclosed promptly to a constable where the appropriate person knows or suspects that another is engaged in money laundering.

## **EDUCATION AND TRAINING**

### **Staff training**

13. A ***relevant person*** shall provide education and training for all directors or, as the case may be, all other persons involved in its management, and all appropriate employees to ensure that they are aware of -

- (a) the provisions of ***the anti-money laundering requirements***;

- (b) their personal obligations under *the anti-money laundering requirements*;
- (c) the internal reporting procedures established under Paragraph 12; and
- (d) their personal liability for failure to report information or suspicions in accordance with internal procedures.

#### **Training for senior and specialist staff**

14. A *relevant person* shall also provide education and training appropriate to particular categories of staff in -

- (a) its policies and procedures to prevent money laundering;
- (b) its *participant* identification, record-keeping and other procedures, and
- (c) the recognition and handling of suspicious *transactions*.

#### **Refresher Training**

15. A *relevant person* shall make arrangements for refresher training at regular intervals (not less than annually) to remind staff of their responsibilities and to make them aware of any changes in *the anti-money laundering requirements* and the internal procedures of the *relevant person*.

### **PROCEEDINGS**

#### **Bodies corporate**

16. (1) This paragraph applies where an offence under Paragraph 3 is committed by a body corporate and it is proved that the offence-

- (a) was committed with the consent or connivance of an officer of the body, or
  - (b) was attributable to neglect on the part of an officer of the body.
- (2) The officer, as well as the body, shall be guilty of the offence.

(3) Where an individual is convicted of an offence under sub-paragraph (2) by virtue of this paragraph, he shall be liable –

- (a) on summary conviction to a fine not exceeding £5,000 or to custody not exceeding 6 months, or to both;
- (b) on conviction on indictment to custody not exceeding 2 years

or to a fine, or to both.

- (4) In this paragraph, "officer" includes –
- (a) a director, manager or secretary
  - (b) a person purporting to act as a director, manager or secretary
  - (c) if the affairs of the body are managed by its members, a member, and
  - (d) in relation to a limited liability company constituted under the Limited Liability Companies Act 1996, a member, the company's manager, or registered agent.

### **Defence**

17. In proceedings against a person for an offence under Paragraph 3, it shall be a defence for that person to show that he took all reasonable steps and exercised all due diligence to avoid committing the offence.

### **Guidance notes**

18. In determining whether a person has complied with any of the requirements of Paragraph 3(1), a court may take account of any relevant guidance issued by a body that regulates, or is representative of, any trade, business, profession or employment carried on by that person.

### **Amendment**

19. In the Schedule to the Anti-Money Laundering Code 1998 [S.D 531/98], at the end of entry 11 add "but excluding business which is online gambling to which the Anti-Money Laundering (Online Gambling) Code 2002 applies".

Made 26<sup>th</sup> September 2002

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Minister for Home Affairs

**Explanatory Note**

(This note is not part of the Code)

The Code is made under section 17F of the Criminal Justice Act 1990. That section was added to the 1990 Act by the Criminal Justice (Money Laundering Offences) Act 1998. The provisions of the Code impose requirements on online gambling businesses to establish anti-money laundering procedures, training and record keeping. Failure to comply will be a criminal offence.

# **Isle of Man Gambling Control Commissioners**

## **Guidance Notes for the Prevention of Money Laundering**

### **Online Gambling**

Whilst this publication has been prepared by the Isle of Man Gambling Control Commissioners for general guidance, it is not a legal document and should not be relied upon in respect of points of law. Reference for that purpose should be made to the appropriate statutory provisions.

To be used as guidance notes for the following legislation:

- (a) **Online Gambling Regulation Act 2001**
- (b) **Anti-Money Laundering (Online Gambling) Code 2002**

Contact: The Secretary  
Isle of Man Gambling Control Commissioners  
Homefield  
88 Woodbourne Road  
Douglas  
Isle of Man  
IM2 3AP  
Tel: 01624 623355 Fax: 01624 621298  
Website: [www.gov.im/gambling](http://www.gov.im/gambling)  
Email: [gaming@gov.im](mailto:gaming@gov.im)

# Isle of Man Gambling Control Commissioners

## Guidance Notes for the Prevention of Money Laundering

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# Isle of Man Gambling Control Commissioners

## Guidance Notes for the Prevention of Money Laundering

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### 1 SECTION 1 – INTRODUCTION

#### 1.1 General Introduction

In producing these Guidance Notes, the Isle of Man Gambling Control Commissioners (the “Commissioners”) are seeking to ensure that:

- (a) permitted forms of online gambling are crime-free, are conducted in accordance with current legislation and are honest, providing protection for the vulnerable and the young.
- (b) the system of regulation should remain flexible so as to respond to future technical developments and to adjust to future regulation.

In order to provide for the introduction of online gambling, all anti-money laundering regulations relating to online gambling have now been incorporated into the Anti-Money Laundering (Online Gambling) Code 2002 (the “2002 Code”), responsibility for the administration of which lies with the Commissioners, in addition to their other statutory duties and responsibilities.

#### 1.2 What is Money Laundering?

Money laundering is the process by which criminals attempt to conceal the true origin and ownership of the proceeds of criminal activities. If successful, the money can lose its criminal identity and appear legitimate.

In basic terms, the money launderer wants to:

- (a) place their money in the financial system, without arousing suspicion;
- (b) move the money around, often in a series of complex transactions crossing multiple jurisdictions, so it becomes difficult to identify its original source. This may involve passing funds through a series of bank accounts and possibly other accounts, including accounts set up for “gambling”; and
- (c) then move the money back into the financial and business system, so that it appears as legitimate funds or assets.

Everyone in society has a moral duty to deter and prevent money laundering and a legal duty not to assist in money laundering. Where money laundering in relation to any crime as well as illegal drugs and terrorism is known or suspected, there are legal provisions which require Licenceholders (referred to as “relevant persons” in the 2002 Code) to report suspicious transactions to the relevant authorities.

# **Isle of Man Gambling Control Commissioners**

## **Guidance Notes for the Prevention of Money Laundering**

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## **2 ISLE OF MAN LEGISLATIVE AND REGULATORY FRAMEWORK**

### **2.1 Legislation**

The Isle of Man, in its contribution to the international initiatives to combat money laundering, has a number of laws which have aimed at preventing and detecting drug trafficking, terrorism and other serious crimes. These include:

- (a) The Drug Trafficking Offences Act 1987;
- (b) The Prevention of Terrorism Act 1990;
- (c) The Criminal Justice Act 1990;
- (d) The Criminal Justice Act 1991;
- (e) The Drug Trafficking Act 1996;
- (f) The Anti-Money Laundering Code 1998;
- (g) The Anti-Money Laundering (Amendment) Code 1999;
- (h) The Anti-Money Laundering (Amendment) Code 2001;
- (i) The Criminal Justice Act 2001;
- (j) The Anti-Money Laundering (Online Gambling) Code 2002;
- (k) Terrorism (United Nations Sanctions) (Isle of Man) Order 2001 (SI2001 number 3364).

### **2.2 The regulatory backdrop**

The Commissioners regard the adoption by Licenceholders of adequate policies, procedures and practices for the deterrence and prevention of money laundering as vital, and they intend that these Guidance Notes should be used as a yardstick for measuring the adequacy of systems to counter money laundering. Occurrences of money laundering, or the failure to have adequate policies, procedures and practices to guard against money laundering, may call into question the adequacy of systems and controls, or the prudence, integrity, fitness and propriety of the management of Licenceholders.

These Guidance Notes are designed to assist Licenceholders in complying with the anti-money laundering legislation by specifying best practice in this regard. The Commissioners recognise that Licenceholders may have systems and procedures in place which, whilst not identical to those outlined in these Guidance Notes, nevertheless impose controls and procedures which are at least equal to, if not

# Isle of Man Gambling Control Commissioners

## Guidance Notes for the Prevention of Money Laundering

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higher, than those contained in these Guidance Notes. The Commissioners will take this into account when assessing the adequacy of a Licenceholder's systems and controls.

It should be noted that the Commissioners consider that these Guidance Notes reflect the Isle of Man Department Of Home Affairs' expectations of all of the Licenceholders' systems and procedures, when they introduced the 2002 Code.

### **2.3 Requirements of the Anti-Money Laundering (Online Gambling) Code 2002**

The 2002 Code states that any person who fails to comply with the requirements of the 2002 Code shall be guilty of a criminal offence regardless of whether money laundering has taken place, and may be liable on summary conviction to a fine of up to £5,000, or to custody of up to 6 months, or to both, and may be liable on conviction on information to custody not exceeding 2 years, or to a fine, or to both. (See Paragraph 3 (2) of the 2002 Code.)

The 2002 Code requires that Licenceholders have in place anti-money laundering policies, procedures and practices, as summarised in Paragraph 3 (1) of the 2002 Code. Licenceholders should always refer to the provisions of the 2002 Code itself in determining the exact requirements applying to them. The 2002 Code is included in these Guidance Notes as Appendix A.

Specifically, the 2002 Code requires that Licenceholders should:-

- (a) Establish procedures, under Paragraph 4 of the 2002 Code, which record the identity of the player (referred to as a "participant" in the 2002 Code) as soon as is reasonably practicable after contact is first made
- (b) Report suspicious transactions
  - when merited, following an assessment of the circumstances;
- (c) Maintain adequate records
  - in terms of completeness, format, location and period of retention, including a register of all enquiries made to the Licenceholder by the investigating authorities and a register of all disclosures made by the Licenceholder to the investigating authorities;
- (d) Adopt adequate internal controls and communication procedures
  - written procedures for preventing money laundering;
- (e) Provide appropriate training for employees

# Isle of Man Gambling Control Commissioners

## Guidance Notes for the Prevention of Money Laundering

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- to educate them on a regular basis about money laundering techniques; their obligations under the law; the internal procedures to forestall and prevent money laundering; and the procedures to follow where money laundering is known or suspected; and
- (f) Establish internal reporting procedures
  - Paragraphs 11 and 12 of the 2002 Code require that Licenceholders establish written internal reporting procedures which cover:
    - (i) the establishment of a reporting chain;
    - (ii) the appointment of an “appropriate person”, i.e. a Money Laundering Reporting Officer (MLRO) to whom all directors and staff should report suspicious transactions;
    - (iii) the MLRO having access to all relevant information, and that the MLRO takes account of it;
    - (iv) the prompt reporting by the MLRO of suspicious transactions; and
    - (v) the establishment of a register recording certain minimum information.

### 2.4 Criminal Justice Act 2001

The Criminal Justice Act 2001 amends the Criminal Justice Act 1990 in several important respects, and Licenceholders should consult with their legal advisors for further information. The key alterations in relation to Licenceholders and their obligations are contained in Part 9 of the 2001 Act, “Proceeds of Crime”, and can be summarised as follows:

- (a) the penalties for a breach of the Anti-Money Laundering Codes have been increased;
- (b) the requirement for the Attorney General’s consent to the disclosure of certain information off the Island, by law enforcement, has been repealed;
- (c) it is an offence to fail to disclose to a constable knowledge or suspicion of money laundering in respect of “all crimes” disclosures; and
- (d) a constable can seek a production order from the High Court for service on an institution in respect of “all crimes” investigations, identical to that previously obtainable by the constable under the Drug Trafficking Act 1996.

### 2.5 Sanctions Notices

On 28 September 2001, the UN adopted Security Council Resolution 1363 (2001). This instructed States to take the necessary steps to freeze funds of entities and/or

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persons suspected of committing, or posing a significant risk of committing, or providing material support for, acts of terrorism. Measures adopted under Resolution 1363 (2001) are in addition to any financial or other sanctions adopted under any other Resolutions.

The United Kingdom (UK) enacts legislation in the Parliament of Westminster to comply with UN Resolutions. As the Isle of Man is not a member of the UN, the UK also enacts legislation on behalf of the Island to give effect to Resolutions on the Island. Therefore on 10 October 2001, an Order-in-Council, the Terrorism (United Nations Measures) (Isle of Man) Order 2001 [SI 2001 No. 3364] came into force, giving effect to UN Resolution 1363 (2001) in Island law.

In relation to this Resolution, the Isle of Man Government Treasury has, and will, from time to time issue lists of individuals and entities suspected of committing, or posing a significant risk of committing, or providing material support for, acts of terrorism. Licenceholders are instructed to check whether they maintain accounts for any of those individuals or organisations listed, and if so to freeze the accounts immediately, and report their findings to the Customs & Excise Division of Treasury within 7 days. Failure to notify Treasury of such dealings is a criminal offence.

Regardless of whether any entity and/or person is named on a list notified by the Treasury, if a person or Licenceholder suspects that the funds of any player are or may be used for facilitating, or providing material support for acts of terrorism, they must report their suspicion immediately to the Isle of Man Constabulary Financial Crime Unit (FCU).

Licenceholders are reminded that a number of Sanctions Notices are in place relating to other persons, entities and countries predating the Resolution relating to terrorism, and that they should give equal priority to all Sanctions Notices. These may be found on the Government website at [www.gov.im](http://www.gov.im). Alternatively, Licenceholders may contact the Sanctions Officer at Customs & Excise, to be added to their emailing list. Copies of Sanctions Notices would then be forwarded directly to the Licenceholders. (See also Appendix D for details of other useful information websites).

All queries on sanctions should be addressed to:

The Sanctions Officer  
The Treasury  
Customs & Excise  
PO Box 6, Custom House  
Douglas  
Isle of Man IM99 1AG

Tel: 648138

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### **3 ESTABLISHING PLAYER ACCOUNTS AND IDENTITY**

The 2002 Code requires Licenceholders to establish and maintain procedures which require players to provide satisfactory information as to their identity. The Commissioners have set out below their guidance on how Licenceholders should identify players.

#### **3.1 Identification of players**

In accordance with Paragraph 4 of the 2002 Code, the Commissioners expect Licenceholders to identify all players before they open an account or accept any money from them, and before any online gambling takes place. In order to do this, Licenceholders must obtain the following information concerning all players:

- (i) full name;
- (ii) residential address including postcode (or equivalent);
- (iii) date of birth;

The player should be required, in the Terms and Conditions of Business, to advise the Licenceholder immediately, or as soon as practical thereafter, of any changes in the above information to that provided on registration.

#### **3.2 Evidence of identity**

For those players whose withdrawals from their account exceed Euro 3,000, in any 30 day rolling period (defined in Paragraph 5.3 of the 2002 Code as a “qualifying payment”), then Licenceholders must establish and maintain procedures to obtain satisfactory documentary evidence of the player’s identity and their address.

The Commissioners consider the following evidence should be obtained:

##### **(a) Documentation for evidence of identity**

Before making a qualifying payment, documentation should be obtained and retained to support, or give evidence to support, the identity of the player.

Identification documents, either originals, photocopies, faxed or computer scanned copies should be clear and legible, bear a signature of the player, be within the expiry period, and show valid and clear document numbering (e.g. Passport Numbers). Where reliance is being placed on faxed or computer scanned copies, Licenceholders need to be vigilant, as such copies can be altered or modified. Examples of acceptable identification documents are as follows:-

- (i) current valid “full” passport; or

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- (ii) Armed Forces ID card; or
- (iii) known employer ID card; or
- (iv) provisional or full driving licence; or
- (v) Government issued National Identity Card

All documents should be plainly legible. Where players put forward documents with which a Licenceholder is unfamiliar, either because of origin, format or language, the Licenceholder must take reasonable steps to verify that the document is indeed genuine, which may include contacting the relevant authorities.

**(b) Documentation for evidence of address**

Licenceholders should take appropriate steps to evidence the residential address of each player. The Commissioners have set out below some examples of acceptable methods to evidence the player's residential address:

- (i) requesting either an original, photocopy, faxed or computer scanned copy of a recent rates, council tax or utility bill. Care must be taken that the document is not more than 3 months old. Mobile telephone bills are not acceptable as evidence of address ;
- (ii) an account statement from a recognised bank or recognised bank credit card. The statement should be the most recent available. Statements featuring a "care of" or accommodation address are not acceptable. Non-bank cards, such as store cards are not acceptable;
- (iii) checking a register of electors;
- (iv) making a credit bureau check which should validate various address and identity details;
- (v) using an address validation/verification service, whether stored electronically or by other means;
- (vi) a recent mortgage statement from a recognised lender.

Whichever method or combination of methods are followed, a copy of any relevant document or documents should be retained, either physically or electronically, to evidence that this has been undertaken (see Section 7 of the Guidance Notes).

Where a player's address is temporary accommodation, (for example an expatriate on a short term contract in the Middle East) or is a Post Office



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(PO) Box number, Licenceholders should adopt flexible procedures to obtain evidence.

Irrespective of the method used, the Commissioners expect Licenceholders to be able to produce evidence of the procedures followed, and that these procedures are adequate, together with any documentary or electronic evidence arising from such procedures.

### (c) **Additional player information required for qualifying payments**

Prior to making a qualifying payment to a player, the Licenceholder should also obtain the following further information:

- (i) any former names, any aliases used and reason for any aliases;
- (ii) place of birth;
- (iii) nationality;

It should be noted that this additional information need not be specifically evidenced by the Licenceholder. However, depending on the jurisdiction of the player, part of this information is likely to be contained in the evidence obtained from the player under 3.2 of the Guidance Notes.

The Commissioners recognise that Licenceholders may have alternative systems to evidence a player's identity and address, which provide the same degree of comfort and assurance as the procedures set out above. If a Licenceholder wishes to use such alternative systems, the Commissioners have no objection, provided that they all fully comply with the 2002 Code.

### **3.3 Other controls on withdrawals from a player's account**

In addition to sections 3.1 and 3.2 of the Guidance Notes, the Commissioners consider that Licenceholders must also apply the following, to assist in identifying a player:

- (a) In accordance with Regulation Statutory Document 297/01 Schedule item 5, all withdrawals must be requested and verified by use of a PIN (valid account security code), which will have been posted to the residential address of the player, and which must confirm the address noted in Section 3.1 of the Guidance Notes.
- (b) All withdrawals must be made in accordance with the requirements as set out in Regulation Statutory Document 297/01 Schedule item 7(1). No third party payments are permitted.
- (c) In circumstances where withdrawals from the player's account exceed Euro 3,000, in any 30 day rolling period, the Licenceholder should have a system

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in place whereby persons only of an appropriate authority level must review and sign the player's file (either an original signature, or via an electronic based signature system) to confirm the acceptance and evidence of the identity of the player. This level of authority does not have to be the MLRO (See Section 5.1 of the Guidance Notes), although the MLRO should have overall responsibility.

For the avoidance of doubt, the procedures described in Section 3.1, 3.2 and 3.3 of the Guidance Notes regarding player information, documentation for evidence of identity and of address, apply to individuals. Individuals should, where possible, be permitted only one account with a Licenceholder (Statutory Document 297/01 schedule item 2 to the Online Gambling Regulation Act 2001). There should be no Corporate Accounts held with Licenceholders.

### **3.4 Additional checks**

The Commissioners consider that in addition to the information provided by the player in Sections 3.1, 3.2 and 3.3 of the Guidance Notes, and as a form of additional verification of players, Licenceholders should ensure that, as part of their online registration process, the following types of controls should be in place to know their player:

- (i) An Internet Protocol (IP) address check of the registrant login. This will assist in denying a player from participating in online gambling from sanctioned countries or "unknown" addresses, based on this IP address. This control should also check for consistency against the country/region of registration details supplied by a player.
- (ii) A player database check, which should test for duplicate registration details of a player or previous accounts held.
- (iii) A validation of the player registration data against the Licenceholder's blacklisted persons.
- (iv) A validation of registration data against recent / previous attempts.

The Licenceholder must maintain a record of when any automated check is overridden. A complete explanation of the reason for overriding the check must form part of the record, and must be signed by the person authorizing the system override, or if electronic means are used, then the identity of the person authorizing the override must be shown, e.g. by means of a password, or electronic signature.

### **3.5 Other matters**

- (a) Persons without standard identification documentation

Due to the worldwide nature of Licenceholders' business, the Commissioners are aware that some players may not be able to produce the

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usual types of evidence of identity, such as a driving licence or passport. In these circumstances, the Commissioners recommend that Licenceholders adopt a common sense approach and some flexibility. Such players are generally able to provide an original, photocopy, faxed or computer scanned copy of other documents, as mentioned in Section 3.2 of the Guidance Notes, which cumulatively give Licenceholders comfort regarding the identity and address of the player.

Licenceholders may apply some flexibility in evidencing a player's identity and residential address, but it must always be remembered that the rigorous anti-money laundering procedures must not be compromised. It is expected that such procedures should only be used sparingly, and only in the limited circumstances described above. In each case there should be a review and sign off procedure undertaken by either the MLRO or a person of an appropriate level of authority (See Section 3.3(c) of the Guidance Notes)

(b) Translation of documents in a foreign language

Licenceholders should ensure that, where appropriate, any documents in a foreign language can be adequately translated into a language that is understood by the Licenceholder's MLRO or their staff, so that the true significance of the document may be appreciated. Licenceholders who employ staff fluent in more than one language may hold such documentation in a non-translated form only if it has been signed off by a person of adequate authority, as explained in Section 3.3(c) of the Guidance Notes, and if a translation into a language understood by the MLRO (and also understandable to the authorised officers of the Commissioners) can be obtained at any time. All staff members translating the documents must be fluent in both the language it is to be translated into, as well as in the language of the document received.

(c) Existing Player Accounts

Licenceholders must obtain full identity details of all of their players, and evidence of identity, where applicable, to comply with the 2002 Code. All accounts established prior to the implementation of the 2002 Code, which are still in use, must comply fully with the 2002 Code.

(d) Face-to-face

Where there is any direct face-to-face contact between a player and a member of the Licenceholder's staff, or its Group's staff, the player can show such staff original documents, and copies can be taken immediately and retained.

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### **3.6 Introduced business**

When considering an introduced application for business Licenceholders should note that an introducer procedure does not represent an exemption from a Licenceholder's obligations under the legislation. All information and documentation must still be received and maintained by the Licenceholder.

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### **4 ONGOING MONITORING OF PLAYER ACCOUNTS**

Once the identification procedures have been completed and the player relationship is established, Licenceholders should monitor the conduct and activities of the account.

The Commissioners are aware that some or all duties of customer support staff may be sub-contracted by Licenceholders. In these instances, the Commissioners expect the Licenceholders to ensure that their sub-contractor's staff will be made aware of their responsibilities concerning the monitoring of player accounts. This function may be carried out either by the Licenceholder or by the sub-contractor, but the responsibility to ensure that it has been carried out rests with the Licenceholder.

#### **4.1 Monitoring – Player Accounts**

The Commissioners expect all Licenceholders to have systems and controls in place to monitor and record, on an ongoing basis, the activity in all player accounts. The purpose of this monitoring is for Licenceholders to be vigilant for any transactions which are significantly different to the normal pattern of transactions or player behaviour, which may be indicative of money laundering activities. Possible areas to monitor could include: -

- (a) transaction type
- (b) frequency
- (c) amount
- (d) geographical origin/destination of funds
- (e) attempted payment into accounts by third parties
- (f) unusual gambling strategies
- (g) different names on debit/credit cards used
- (h) failed debit/credit card transactions

A copy of such procedures should be available to the Commissioners if requested, and the Licenceholder should be able to provide a demonstration of these procedures if requested.

The Commissioners believe that the most effective method for the monitoring of player accounts is achieved through a combination of computerised and manual solutions. A corporate compliance culture, and properly trained, vigilant staff through their day-to-day dealing with players' accounts, should form an effective monitoring method. An additional computerised approach may be to include the setting of "floor levels" for monitoring the accounts by amount.

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Whilst some Licenceholders may wish to invest in expert computer systems specifically designed to assist in the detection of fraud and money laundering, the Commissioners recognise that this may not be a practical option for many Licenceholders for the reasons of cost, the nature of their business, or difficulties of systems integration.

Remember that it is not just new business relationships which may be used to launder money. Relationships with existing and long-standing players should also be monitored closely for money laundering.

### **4.2 Electronic payment and message systems**

In order to comply with the requirements of the FATF, Licenceholders must ensure that details of senders and beneficiaries are incorporated in all payment messages sent via electronic payment and message systems.

The Commissioners expect that the following information should be included as a minimum:

- (a) Bank account number
- (b) Name of account
- (c) Name of bank
- (d) Address of branch
- (e) Branch sort code

Where the required information is not present, or the information is not precise (e.g. the remitter of the funds is not shown as the “player”, due to the funds having been first passed through an intermediary’s suspense account), Licenceholders should reject the transfer of funds. Licenceholders may, however, hold the received funds on a (non-interest paying) suspense account for a period of no more than seven bank working days, while ascertaining the source of the funds. If the origin and source of the funds have not been ascertained at the end of that time, the funds must be rejected.

Licenceholders should be vigilant of attempts to obscure the ownership or origin of funds, and in particular should be cautious where the payment originates in any jurisdiction known to apply secrecy provisions to its banking and financial operations and their dealings with account holders, which could include countries that are FATF members.

Records of all electronic payments and messages must be retained in accordance with Paragraphs 8 and 9 of the 2002 Code. (See Section 7 of the Guidance Notes).

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### **4.3 Source of funds and source of wealth**

When monitoring a player account, Licenceholders should consider making enquiries to ascertain the source of wealth. The Commissioners appreciate that there may be problems associated with obtaining this information, particularly in an internet business, and that there may be difficulties in assessing the reliability of such information provided by a player.

The Commissioners consider that making these enquiries, to ascertain a player's source of wealth, may help Licenceholders build a better profile of the player and obtain comfort that their player's circumstances are fully understood, particularly where there are transactions which are significantly different to the normal patterns of that player.

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### **5 CONTROLS AND COMMUNICATION**

Licenceholders must establish an internal procedures manual so that, in the event of a suspicious transaction being discovered, all staff, including any staff of sub-contractors, are aware of the reporting chain and the procedures to follow.

#### **5.1 Appointing a Money Laundering Reporting Officer (MLRO)**

The 2002 Code requires that Licenceholders appoint a suitably qualified and experienced officer of their company (“an appropriate person”) to whom suspicious transaction reports should be made by staff. The Commissioners would generally expect the MLRO to be a senior member of staff carrying out a Compliance, Audit or Legal role within the Licenceholder’s business, and who reports directly to, or is, the Designated Official. The Commissioners also expect Licenceholders to appoint a Deputy MLRO. (Both the MLRO and the Deputy MLRO should be suitably qualified and experienced in both the business of the Licenceholder and in Anti-Money Laundering).

#### **5.2 Identifying the MLRO and reporting chains**

All staff engaged in the business of the Licenceholder at all levels must be made aware of the identity of the MLRO and their Deputy, and the procedure to follow when making a suspicious transaction report. All staff must be aware of the chain through which suspicious transaction reports should be passed to the MLRO.

#### **5.3 The scope of the role of the MLRO**

It is the responsibility of the MLRO to consider all suspicious transaction reports he receives in the light of full access to all relevant documentation and other parties. All Licenceholders should ensure that the MLRO receives full co-operation from all staff and full access to all relevant documentation so that he is in a position to decide whether money laundering is suspected or known.

Failure by the MLRO to consider diligently all relevant material may lead to vital information being overlooked and the suspicious transaction not being disclosed to the FCU in accordance with the requirements of the appropriate legislation. Alternatively, it may also lead to vital information being overlooked, which may have made it clear that a disclosure would have been unnecessary. As a result, the Commissioners recommend that the MLRO should establish and maintain a register of money laundering referrals made to him by staff.

#### **5.4 Recording disclosures**

Licenceholders must establish and maintain a register of all disclosures made to the FCU. The register should include details of the date of the disclosure, the person making the disclosure, the date of the disclosure acknowledgement from the FCU, details of any further information or action required by the FCU, and any further information which would allow the papers relevant to the disclosure to be located.



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### **5.5 Data Protection**

The Commissioners expect that Licenceholders may wish to keep their register of disclosures in electronic format, and that as a result the data held will be subject to the provisions of the Data Protection Act 1986. This is equally true of the register that Licenceholders must keep of enquiries from law enforcement authorities, as required in Paragraph 11 of the 2002 Code.

Licenceholders should check their registration status with the Office of the Data Protection Registrar to ensure that they are correctly registered, and are adequately covered to permit disclosure of all matters which, by law, they may be required to disclose to either the Commissioners or the FCU.

It should be noted that a new Data Protection Act is due to go to the Council of Ministers for its 3<sup>rd</sup> reading. Expectations from the Office of the Data Protection Registrar are that the Act will become effective in April 2003, but this date may be changed.

Licenceholders should, therefore, appraise themselves of any further developments, and can contact the Office of the Data Protection Registrar directly, at:

Data Protection Registrar  
Willow House  
Main Road  
Onchan

Tel : 661030  
Fax : 661088  
Email : [odpr@odpr.gov.im](mailto:odpr@odpr.gov.im)

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### 6 REPORTING SUSPICIONS AND CONTINUED SUSPICIONS

The 2002 Code states that Licenceholders should ensure that staff report all suspicious transactions (or suspicions which do not necessarily arise from a specific transaction) to the MLRO, and that the MLRO should “*consider any report in the light of all other relevant information available to him for the purpose of determining whether or not it gives rise to a knowledge or suspicion of money laundering*”. (See Paragraph 12 (d) of the 2002 Code). This should also include staff of any sub-contractors, who may be providing services to the Licenceholders, e.g. customer support.

Where staff continue to encounter suspicious activity or transactions on an account or in relation to a player which they have previously reported to the MLRO, they should continue to make internal reports to the MLRO on each occasion of suspicion, and the MLRO should determine whether a disclosure in accordance with the legislation is appropriate. The MLRO should make repeated disclosures to the FCU where suspicious activity continues.

All disclosures and repeat disclosures are to be made to the Isle of Man Constabulary FCU only.

It should be noted that Section 6 of these Guidance Notes has been reviewed by the FCU, who consider that the content of this section meets with their approval.

#### 6.1 Identifying suspicions

When there is a change in a pattern of transactions, it is important to differentiate properly between transactions which are significantly different to the normal pattern, that are “unusual” and those which are “suspicious”.

Where a transaction is inconsistent in amount, origin, destination, or type with a player’s known account activities, the transaction might be considered *unusual*, and the Licenceholder put “on enquiry.” The Licenceholder should then obtain a satisfactory explanation from, the player, in the case of such a transaction that is significantly different from the normal pattern of business.

Where the Licenceholder conducts enquiries and obtains what he considers to be a satisfactory explanation of the unusual activity, he may conclude that there are no grounds for suspicion, and therefore take no further action. However, where the enquiries conducted by the Licenceholder do not provide a satisfactory explanation of the activity, he may conclude that there are grounds for *suspicion*, and therefore may make a disclosure.

The key to recognition is having enough knowledge about the player to recognise that a transaction, or series of transactions, is unusual.

Examples of what might constitute suspicious circumstances are given in Appendix C. The list of these examples has been provided after consultation with the

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Licenceholders. This list is not intended to be exhaustive and only provides examples of the most basic ways by which money may be laundered. However, identification of any of the types of transactions listed in the Appendix may prompt an internal report to the MLRO for further enquiry.

When transactions or other circumstances are identified as unusual, Licenceholders should ensure that they make enquiries, asking the questions an honest person would reasonably ask themselves in the circumstances. Such enquiries, where conducted properly and in good faith, do not constitute “tipping off” (see Section 6.5 of the Guidance Notes) where a disclosure has not yet been made or where the Licenceholder has no reason to believe a disclosure has been made, or where he has no knowledge of or reason to believe that an investigation of the player is about to be started or already under way by the relevant authorities.

Such enquiries can be addressed using a “customer service approach”, and are of course directly linked to knowing your player, and indicate the importance of knowing your player in allowing unusual or suspicious activity to be detected. Such enquiries and their result should be properly documented, and where suspicion remains, the whole transaction (where applicable) and circumstances surrounding it should be reported to “a constable” in accordance with the legislation, using the Financial Disclosure Form, available from the FCU.

Licenceholders should note that in the event of a suspicion of money laundering, a disclosure should be made even where there has been no transaction by or through the Licenceholder.

Licenceholders should ensure that they do not commit the offence of “tipping off” the player who is the subject of the disclosure. Licenceholders should also take care that their line of enquiry with players is such that “tipping off” cannot be construed to have taken place.

### **6.2 Questions to ask yourself**

The following factors should be borne in mind when seeking to identify a suspicious transaction or to “risk profile” an account:

- (a) Is the transaction in keeping with the player’s normal activity known to the Licenceholder?
- (b) Does the IP address check indicate that the country/region in which the player is located has changed?
- (c) Is the transaction coming from, or going to, an unusual financial institution?
- (d) a significant transaction (relative to a relationship)
- (e) a material change in the operation of the account

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- (f) a change in the existing customer details which increases a risk profile
- (g) is the player known personally?

This list is not intended to be exhaustive and is only to provide examples.

### **6.3 Reporting suspicions**

The FCU acts as the central clearing point for all suspicious transaction disclosures, and therefore any disclosure that is Customs & Excise related should still be made to the FCU. Any Customs & Excise related disclosures will be passed on accordingly.

However, Officers at the Isle of Man Customs and Excise, prior to any formal disclosure being made, would welcome contact and dialogue with Licenceholders who believe there is a Customs and Excise element to a transaction or transactions under scrutiny.

Suspicious transaction disclosures should be sent directly to the following address and not to any other regulating authority:-

**The Officer in Charge**  
**The Isle of Man Constabulary FCU**  
**PO Box 51**  
**Douglas, Isle of Man IM99 2TD**  
Tel: (01624) 686000 (Office hours)  
Fax: (01624) 686039  
Email: [fcu@gov.im](mailto:fcu@gov.im)

The disclosure of suspicious transactions should only be made on the Isle of Man Disclosure Form. This form should then be forwarded directly to the FCU, at the address mentioned above.

Licenceholders should provide as much detail as possible and may wish to send any supporting documentation with the Disclosure Form. Every effort should be made to avoid bland or generalised statements on the disclosure.

Failure to provide sufficient information at the outset may hinder the commencement or progress of an investigation by the authorities, and may result in a “consent letter” from the FCU being initially withheld. (The “consent letter” is provided, where applicable, by the FCU to the Licenceholder, acknowledging receipt of the report and allowing the Licenceholder to continue its business with the player, should they wish to do so. Provision of this “consent letter” does not provide any legal surety by the FCU. Any further suspicions concerning the player must still be reported in the usual way).

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Licenceholders wishing to discuss any queries concerning a disclosure should inform the FCU directly, and not the Commissioners.

Institutions that routinely send copies of any disclosures to their Head Office in the UK, or other jurisdictions, may still do so. However, it should be noted that the legal responsibility for reporting suspicious transactions in the Isle of Man rests with the Isle of Man Licenceholder rather than with its Head Office. Care should also be taken that any Isle of Man disclosure that is copied to a Head Office should not then be passed to any other Financial Crime Unit by a Head Office in another jurisdiction.

The final decision to make a disclosure in the Isle of Man will rest with the Licenceholder's MLRO only. A Head Office, or any officer of the Licenceholder on the Isle of Man, should not be able to over-rule the decision of the MLRO in this respect.

The Criminal Justice Act 1990, as amended by the Criminal Justice Act 2001 makes it an offence to fail to disclose knowledge or suspicion of the laundering of the proceeds of crime in an "all crimes" context, and therefore reporting of knowledge or suspicion is now obligatory in all circumstances, not just in cases believed or known to relate to drug trafficking or terrorism. Further guidance from the FCU is included as Appendix B.

### **6.4 Reporting refused business**

The Commissioners believe that where Licenceholders turn away business because it might be criminal, in intent or origin, the Licenceholders should also make a disclosure to law enforcement, albeit that no transaction has taken place.

Reporting of such events will allow the FCU to build a clearer picture of the money laundering threat to the Island, and to use such intelligence on a proactive basis. A further benefit of reporting such declined business is that money launderers will perhaps be discouraged from trying to place criminal business on the Island in future.

This approach is consistent with developing international best practice.

### **6.5 Tipping Off**

A person is guilty of an offence if:

- (a) he knows or suspects that a constable is acting, or is proposing to act, in connection with an investigation which is being, or is about to be, conducted, and  
  
he discloses to any other person information or any other matter which is likely to prejudice that investigation or proposed investigation;

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- (b) he knows or suspects that a disclosure has been made to a constable, and  
he discloses to any other person information or any other matter which is likely to prejudice any investigation which might be conducted following the disclosure;
- (c) he knows or suspects that a disclosure has been made, and  
he discloses to any person information or any other matter which is likely to prejudice any investigation which might be conducted following the disclosure.

In proceedings against a person for an offence under subsection (a) to (c) above, it is a defence to prove that the person did not know or suspect that the disclosure was likely to be prejudicial in the way mentioned in that subsection.

However, nothing in subsections (a) to (c) above makes it an offence for a professional legal adviser to disclose any information or other matter:

- (a) to a client of theirs (or representative of the client) in connection with the provision of legal advice to the client; or
- (b) to any person:
  - (i) in contemplation of, or in connection with, legal proceedings; and
  - (ii) for the purpose of those proceedings.

Subsections (a) and (b) directly above do not apply in relation to any information or other matter which are disclosed with a view to furthering any criminal purpose.

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### 7 RECORD KEEPING

Paragraphs 9 (1) and 9 (2) of the 2002 Code lay down a Licenceholder's obligations regarding record keeping.

Where a disclosure is made to a constable, records should be kept in accordance with Paragraph 9 (3) of the 2002 Code. (i.e. retain for "*as long as required by the constable.*")

All records should be kept so that they are "*capable of retrieval without undue delay.*" (see Paragraph 10 (1) of the 2002 Code.)

#### 7.1 Records

##### (a) Identification information and evidence records

Paragraph 7 of the 2002 Code requires that records containing identification information and evidence of players are kept on the Island, or alternatively, that a record be maintained on the Island, containing such information as would allow a copy of such evidence to be obtained. Such records must be retained for the period of the business relationship with the player plus at least 6 years.

##### (b) Transaction records

Licenceholders are required by the 2002 Code to maintain a record of all transactions undertaken. These records may be in the form of electronic transaction reports, original documents or copy form. (It is recommended that such copies should be of a form admissible in Court proceedings.) These will be records in support of entries in the accounts of whatever nature is appropriate to the business of the Licenceholder, and must be retained for a period of at least 6 years from the date of the transaction.

##### (c) Training records

So that Licenceholders can demonstrate that they have complied with the provisions of Paragraphs 13, 14 and 15 of the 2002 Code concerning staff training, they should maintain records which include:

- (i) details of the content of the training programmes provided;
- (ii) the names of staff who have received the training;
- (iii) the date on which the training was delivered; and
- (iv) the results of any testing carried out to measure staff understanding of the anti-money laundering requirements.

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Although the 2002 Code does not state over what period training records must be retained, the Commissioners consider that Licenceholders should retain such records for a minimum of 6 years from the date the training took place.

### **7.2 Contents of transaction records**

Licenceholders are required by Regulations, under the Online Gambling Regulation Act 2001, to maintain certain records relating to players and their transactions. It is necessary to ensure that a satisfactory audit trail can be established for anti-money laundering purposes and that a financial profile of any suspected account can be established. To satisfy this requirement, the following additional information may be sought as appropriate, and transaction records retained of:

- (a) the volume of funds flowing through the account/turnover of the player;
- (b) the form in which the funds were deposited or withdrawn, i.e. credit card, cheque, etc. to/by the player;
- (c) the identity of the person undertaking the transaction;
- (d) the form of instruction and authority;
- (e) the external financial account details from which the funds were paid (including, bank name, sort code, account number and name of account holder);
- (f) the form and destination of payments made by the Licenceholder to the player;
- (g) a record of all deposits, both successful and unsuccessful, made to the player's account.

### **7.3 Establishment of registers**

The 2002 Code requires Licenceholders to establish and maintain registers as follows:

- (a) money laundering enquiries from the authorities; and
- (b) money laundering disclosures to the authorities.

Licenceholders must keep, in the Island, Registers in accordance with the requirements of Paragraph 11 of the 2002 Code. The Commissioners require that Registers should be readily accessible to Authorised Officers of the Commissioners.



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### **7.4 Responding to production orders**

The Commissioners expect all Licenceholders to be in a position to retrieve relevant information without undue delay in response to any request, production orders, warrants etc.

Much international damage may be done to the Island's reputation if requests for international assistance, duly authorised by the Isle of Man Attorney General's Chambers, are not serviced within the time period specified in the notice.

Due to the importance the Isle of Man Government places on its mechanisms for international cooperation, in circumstances of repeated failure by a Licenceholder to comply with such requests or notices, the Commissioners will consider that the Licenceholder is not complying with Paragraph 10 (1) of the 2002 Code (i.e. records to be retrievable without undue delay), which can only impact upon the Commissioners' view of the Licenceholder's fitness and properness.

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### **8 TRAINING AND AWARENESS**

Licenceholders should ensure that all appropriate staff, (in accordance with Paragraphs 13 and 14 of the 2002 Code), receive training on anti-money laundering prevention on a regular basis; ensure that all staff fully understand the procedures and their importance; and ensure that they fully understand that they will be committing criminal offences if they contravene the provisions of the legislation. Aspects to be covered by such training are specified in Paragraphs 13, 14 and 15 of the 2002 Code.

The Commissioners are aware that some or all duties of customer support may be sub-contracted by Licenceholders. In these instances, the Commissioners expect the Licenceholders to ensure that their sub-contractor's employees will be made aware of their responsibilities, and will receive training appropriate to their level of seniority and function, (see Section 8.4 of these Guidance Notes) as required under the 2002 Code. These functions may be carried out either by the Licenceholder or by the sub-contractor, but the responsibility to ensure that it has been carried out rests with the Licenceholder.

#### **8.1 Isle of Man Constabulary Training**

The FCU is keen to assist institutions with their ongoing training programmes. Requests for such assistance should be sent to the FCU at the address previously given in Section 6.3 of these Guidance Notes.

#### **8.2 The timing and content of training programmes**

Although general provisions are made in Paragraphs 13, 14 and 15 of the 2002 Code, they do not specify the exact nature of training to be given to staff, and therefore each Licenceholder can tailor its training programmes to suit its own needs, depending on size, resources and the type of business they undertake. Licenceholders with no in-house training function may wish to approach third parties such as specialist training agencies, firms of advocates or legal practitioners, or firms of accountants or management consultants. Training should be structured to ensure compliance with all of the requirements of the applicable legislation.

#### **8.3 Staff awareness**

Staff should appreciate the serious nature of the background against which the 2002 Code has been issued. They should be aware of their own personal obligations and of their personal liability under the legislation should they fail to report information in accordance with internal procedures. All staff should be encouraged to co-operate fully and provide a prompt and adequate report of any suspicious transactions.

All relevant staff need to be fully educated in the "Know Your Customer" requirements for the prevention of money laundering. Training should therefore cover not only the need to know the player's identity, but also the level of gaming activity and account transactions, so that suspicious activity can be identified, and

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that staff remain vigilant for changes in these levels. Failure to provide this training and awareness may hinder staff becoming alerted to any changes in the player circumstances or any regular pattern of play, which might indicate criminal activity.

### **8.4 New employees**

Irrespective of seniority, all new employees who will be dealing with players, or their transactions, should be given a general introduction to the background of anti-money laundering and the procedures for reporting suspicious transactions to the MLRO, prior to them becoming actively involved in day to day operations. New employees should also receive a clear indication of the importance placed on anti-money laundering issues by the Licenceholder, of the legal requirement to report, and of their personal legal obligations in this regard.

### **8.5 Operations staff**

Customer Service Staff who deal directly with players, are the first point of contact with potential money launderers, and their efforts are vital to an organisation's effectiveness in combating money laundering at the new business stage, and as the player relationship progresses. Staff dealing with new players should be aware of the need to obtain satisfactory evidence of the player's identity, for new and existing player relationships, and be aware of the need to report suspicious transactions even if the transactions or business relationship do not proceed. Training should be given on the factors that may give rise to suspicions about a player's activities, and on the procedures to be adopted when a transaction is considered to be suspicious.

Staff involved in the processing of transactions should receive relevant training in the processing and evidencing procedures, and in the recognition of abnormal online gambling activity, and any abnormal payments. Staff should be aware of the types of suspicious transactions that may need reporting to the relevant authorities regardless of whether the transaction was completed. Staff should also be aware of the correct procedure to follow in such a circumstance.

### **8.6 Training for supervisors, managers, and persons acting as directors or secretaries of Licenceholders**

Supervisors, managers, and those acting as directors or secretaries of Licenceholders should receive a higher level of training covering all aspects of anti-money laundering procedures. This should include the offences and penalties arising from the relevant primary legislation for non-reporting or for assisting money launderers, the procedures relating to dealing with production and restraint orders and the requirements for evidencing identity and retention of records.

### **8.7 Training for Money Laundering Reporting Officers**

MLROs and Deputy MLROs, (where appointed to provide cover for any MLRO absences, and therefore to provide a source of constant supervision within the

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Licenceholder) should receive in-depth training on all aspects of the primary legislation, the 2002 Code and internal policies. They should also receive extensive initial and ongoing instruction on the validation and reporting of suspicious transactions, on the feedback arrangements and on new trends of criminal activity.

### **8.8 Continuing vigilance and refresher training**

Over time, and due to the multiple demands that may be placed on their time, there is a danger that staff may become less vigilant concerning money laundering. It is therefore vital that all staff receive appropriate refresher training to maintain the prominence that money laundering prevention requires, and that they fully appreciate the importance that their employer places on it and their obligations arising from it.

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### **9 CULTURE**

#### **9.1 Compliance culture**

The Commissioners recognise that Licenceholders exist to make a profit. Nevertheless, the Commissioners expect that each Licenceholder should give due priority to establishing and maintaining an effective compliance culture.

The business objectives of player care are closely aligned to the regulatory objectives of the “Know Your Customer” principle. Similarly linked are the philosophies behind the regulatory objectives of protecting the reputation of the Isle of Man and the commercial desirability of protecting the reputation of individual Licenceholders.

In these respects the Commissioners recognise that effective anti-money laundering policies and procedures can only be delivered through partnership with the industry and accordingly, would urge all Licenceholders to give much consideration to ensuring they encourage an open and welcoming approach to compliance and anti-money laundering issues amongst staff and management.

#### **9.2 Vigilance**

Vigilance and an enquiring and questioning culture will reduce the risk of Licenceholders’ businesses, and indeed staff, becoming the victims of criminals who launder money.

#### **9.3 Robustness**

Licenceholders should not hesitate to ask their players questions in circumstances of unusual activity, even in cases where the players may consider these questions to be intrusive, so that the Licenceholders may more clearly understand the reasons for the activity (see Section 6.3 of the Guidance Notes). Any reluctance or failure by the player to provide credible and verifiable answers may well give grounds for suspicion about their activities, make the Licenceholder reconsider the wisdom of doing business with him and, potentially, lead to a suspicious transaction report being made.

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## **APPENDIX A**

### **ANTI-MONEY LAUNDERING (ONLINE GAMBLING) CODE 2002**

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### **APPENDIX B**

#### **FURTHER GUIDANCE FROM THE ISLE OF MAN CONSTABULARY FINANCIAL CRIME UNIT (THE “FCU”)**

Within the FCU there are in effect three teams:

- Financial Intelligence Team
- External Cooperation Team (including International assistance)
- Fraud Investigation Team (involving serious or complex fraud allegations)

In addition to Police Officers, the Financial Intelligence Team is staffed by Officers of the Isle of Man Customs & Excise.

The FCU deals with all money laundering disclosures made under the following Isle of Man legislation:

- Section 17(a) or Section 17(b)(5) of the Criminal Justice Act 1990
- Section 46(3) or Section 47(5) of the Drug Trafficking Act 1996
- Section 10(2) of the Prevention of Terrorism Act 1990

In relation to all money laundering disclosures, the FCU will

- Assess
- Process
- Issue an acknowledgement letter as appropriate
- Investigate
- Disseminate

Feedback will be given to licenceholders wherever possible, but it should be recognised that investigations can often be protracted.

Licenceholders should continue to monitor the activities of the subject of any money laundering report(s). Any further suspicions should be reported without delay.

Guidance on matters relating to disclosures can always be sought from any member of the FCU.

There is no minimum figure when consideration is being given to the making of a money laundering disclosure. Additionally, where business has been declined because of certain suspicions, consideration must be given to the making of a disclosure in those circumstances.

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Disclosures required to be made as a consequence of Government Sanctions issued against other foreign countries, organisations or individuals are dealt with by the Legal Section of the Isle of Man Customs & Excise.



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### **APPENDIX C**

#### **SUSPICIOUS TRANSACTIONS**

The list of examples that might constitute suspicious circumstances has been provided after consultation with the Licenceholders. This list is not intended to be exhaustive and only provides examples of the most basic ways by which money may be laundered. However, identification of any of the types of transactions listed below may prompt an internal report to the MLRO for further enquiry.

1. Nominal play levels:
  - (a) Significant deposits, with minimal play (or no play) followed by withdrawal.
  - (b) Multiple deposits (adding up to a significant amount) with minimal play (or no play) followed by withdrawal.
2. Large deposits with no play record after significant time period.
3. Suspicious ID Details:
  - (a) The provision of identification details a Licenceholder believes to be false or altered.
  - (b) A change of ID details or repeated significantly incorrect verification of ID details.
4. Attempts to bribe, corrupt or unduly influence Licenceholder's staff to change transaction data, sensitive ID data etc.
5. Significant re-routing of funds:
  - (a) Attempts to transfer to third parties.
  - (b) Attempts to transfer to jurisdictions of concern.
6. Attempts to create a false handle with a significant deposit. The issue of significant deposit is important as it will sort out the real suspicious activity from the common bonus hunting activity where first time depositors try to convert welcome bonus money into real money balances via the same method.
7. Even money betting strategies as applied typically to Roulette, Bacarrat and Craps, as follows:

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(a) **Roulette**

Placing equal bets on Black and Red, Red and Black, Odd and Even, High and Low and suffering the loss of half the stakes each time zero appears.

Placing the same bet on every number (0-36) and suffering the loss of 2.7% of the total stake each spin.

Variations of these bets to achieve the same reduction of risk. For example, on roulette backing the first dozen for 2 units, the six line 13/18 for one unit and High for 3 units. There are other variations that achieve a similar outcome and these will be apparent to an experienced casino supervisor.

(b) **Baccarat**

Playing both Player and Banker.

(c) **Craps**

Playing both Pass and Don't Pass lines or Come and Don't Come lines.

8. Collusive attempts by two or more players, in multi-player mode of the casino, to effect even-money betting strategies (e.g. one bets odd and the other even and at the end of the day the kitty is intact).
9. Any deposits by players that a Licenceholder has good reason to suspect of being involved in illicit business.

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### APPENDIX D

#### USEFUL CONTACT REFERENCES

The Commissioners encourages use of the Internet as an information resource for anti-money laundering, and encourage Licenceholders and other interested parties to periodically access the FSC website at [www.fsc.gov.im](http://www.fsc.gov.im) for information relating to money laundering and due diligence issues.

Licenceholders may also find the following sites useful for due diligence or general information purposes. The list is not exhaustive, and Licenceholders are encouraged to use other Internet resources:

- [www.gov.im/treasury/customs](http://www.gov.im/treasury/customs) for information on sanctions.
- [customs@gov.im](mailto:customs@gov.im) to email IOM Customs & Excise.
- [www.fsc.gov.im/content/docs/Passport.html](http://www.fsc.gov.im/content/docs/Passport.html) for information on false identity documents.
- [www.dti.gov.uk](http://www.dti.gov.uk) for information on embargoes.
- [http://dailynews.yahoo.com/fc/business/money\\_laundering](http://dailynews.yahoo.com/fc/business/money_laundering) for money laundering news stories and related web sites.
- [www.oecd.org/fatf](http://www.oecd.org/fatf) for anti-money laundering information and updates from FATF.
- [www.occ.treas.gov/launder/orig1.htm](http://www.occ.treas.gov/launder/orig1.htm) for helpful information about money laundering prevention and detection from the Office of the Comptroller of the Currency in the USA.
- [www.treas.gov/fincen/](http://www.treas.gov/fincen/) for information about the activities of the Financial Crimes Enforcement Network of the US Department of the Treasury.
- <http://pub17.ezboard.com/bdiligizer> and
- <http://pub16.ezboard.com/bduediligenceboard> for searchable due diligence information (mainly relating to the USA and UK) regarding suspected scams and their operators.
- [www.keesing.nl](http://www.keesing.nl) for information about worldwide valid passports, driving licences and vehicle registration documents.
- Access to some sites requires Adobe Acrobat Reader software, which can be obtained at [www.adobe.com](http://www.adobe.com).